ERSEA Systems: Best Practices to Maintain Full Funded Enrollment

*All materials found on this presentation can be found on ECLKC.
Anticipated Outcomes

Participants will:

• Know the importance of ERSEA as the system to ensure best practices are implemented to recruit and enroll children and families most in need;
• Identify strategies to maintain full enrollment;
• Engage in group work to analyze enrollment data;
• Review realistic under-enrollment plan components;
• Engage group discussions about successful efforts to provide services for all eligible children in the recruitment area; and
• Compare and contrast program specific tools used to determine eligibility.
Mountain in Alaska – 20,322 feet

Mount Denali
Child and Family Outcomes

- Self-Assessment
- Planning
- Program Governance
- Human Resources
- Facilities, Materials & Equipment
- Record-keeping & Reporting
- Communication
- Ongoing Monitoring
- Fiscal Management
- ERSEA
Systems Are Linked

- ERSEA
- Self-Assessment
- Fiscal Management
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Systems Are Linked

- ERSEA
- Self-Assessment
- Fiscal Management
- Record-keeping & Reporting
- Ongoing Monitoring
Components of the Under-Enrollment Plan:

- Outreach, recruitment and communitywide strategic planning;
- Changing demographics, mobility of populations, and new underserved low-income populations
- Facilities-related issues
- Ability to provide full-working day programs and/or other early childhood education programs in the services area
- Agency Management Procedures
Active Volcano in Washington State – 8,363 feet

Mount St. Helens
Determining Community Strengths and Needs through the Community Assessment 1305.3

• Define Recruitment Area
• Define Service Area
• Determine Eligibility Criteria
• Determine Number of Children with Special Needs
• Community Outreach – Who are valued partners?
Navigating through the Full Enrollment

William Maes, Grantee Specialist
AIAN, T/TA Network

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PROGRAM INSTRUCTION:

TO: Head Start and Early Head Start Grantees and Delegate Agencies

SUBJECT: Achieving and Maintaining Full Enrollment

INSTRUCTION:

This Program Instruction explains the Head Start Bureau’s policies and expectations regarding grantee compliance with the requirements of 45 CFR Part 1305 - Eligibility, Recruitment, Selection, Enrollment and Attendance in Head Start, particularly the need to achieve and maintain full funded enrollment.

We all understand how important a Head Start experience can be in the lives of our nation’s disadvantaged children and families. In recognition of this, in fiscal year 2004 the Congress appropriated funds to promote the school readiness of 909,000 low-income children through the provision of comprehensive Head Start services. However, annual Program Information Report (PIR) data, as well as non-compliance findings from on-site program reviews, indicate that an increasing number of grantees are having problems maintaining their full funded enrollment. By accepting a Head Start grant your agency is agreeing to the terms of that grant, including the requirement that you serve the full number of children for whom you have been funded. We cannot allow potentially thousands of children to be denied a Head Start experience because some grantees do not achieve and maintain their full funded enrollment.
Giving all eligible children a chance to participate in Head Start

Because Head Start is not able to serve all of the low-income children who meet its eligibility criteria, one of the most important responsibilities grantees have is to decide which children are selected to be enrolled and which are not. Your agency is required by 45 CFR 1305 to take a number of important actions, including:

- Conducting a Community Assessment of the strengths and needs within your approved service area.
- Using the assessment to determine your program’s design option(s), the high-need areas from which children will be recruited (if your program does not have the resources to reach your entire service area), the location of centers, and the criteria that define the types of children who will be given priority for recruitment and enrollment.
- Recruiting the greatest number of children possible so they can be considered for selection and enrollment.
- Enrolling the children and families with the greatest need for Head Start services.

Although it may not be possible to serve all the low-income children in your service or recruitment area, each eligible family has a right to learn about Head Start and be given a fair chance to have their child considered for enrollment. This means taking steps such as providing recruitment materials in the languages of the major population groups who live in your area and hiring staff who can to do outreach to these families in their languages.
In many communities throughout the country, there have been dramatic changes in population and demographics over the past decade, such as the large number of Hispanics living in areas where they have not traditionally lived. Are there new populations who have moved into parts of your service area where your Head Start program does not recruit children? Does the location of your program’s centers or its transportation services make it difficult or impossible for these families to enroll in Head Start? It is important that you regularly review your designated recruitment areas to be sure they continue to be appropriate. We urge you to make special efforts to reach populations who historically have been underserved. Changing demographics should result in a changing Head Start program.

It is particularly important for programs that are having difficulty maintaining full enrollment to take steps to reach new populations and unserved neighborhoods and to revitalize outreach and recruitment efforts.
Maintaining full enrollment

Another critical part of 45 CFR 1305 concerns maintaining full enrollment. The regulation requires that “A Head Start grantee must maintain its funded enrollment level” and further states that, in order to do this, “Each Head Start program, except migrant programs, must obtain a number of applications during the recruitment process ... that is greater than the enrollment opportunities that are anticipated to be available over the course of the next enrollment year in order to select those with the greatest need for Head Start services.” It should be noted that programs are expected to be at full enrollment on the first day of their enrollment year.

The regulation also requires that, “...no more than 30 days may elapse before a vacancy is filled”, except that, “A program may elect not to fill a vacancy when 60 calendar days or less remain in the program’s enrollment year.” Grantees complying with these requirements will ensure that the maximum number of eligible children possible receive the benefits of Head Start services. Such grantees should not have any problems maintaining full enrollment.
Grantees that are not maintaining full enrollment or anticipate they may soon be at less than full enrollment (for example, because they have no waiting lists) must immediately contact their ACF Regional Office. In most cases, the Regional Office will schedule an on-site visit to assess the reasons for this and, in conjunction with the grantee, make a judgment about how to resolve this issue.

If enrollment issues are due to changing demographics that have resulted in there being insufficient numbers of eligible children in the grantee’s service area, one approach could be for the ACF Regional Office to reduce, through issuance of a Financial Assistance Award, grantee enrollment with a proportionate reduction in funding. In situations where an enrollment reduction is not appropriate, such as when there are still many unserved Head Start-eligible children in the grantee’s service area, the grantee and the Regional Office will need to develop a strategy for reaching full enrollment as soon as possible. In most cases, this will include designating the grantee’s enrollment problem as a non-compliance finding which will need to be corrected within 90 days. The Regional Office and, as appropriate, the T/TA system will work with the grantee during this 90 day period. If this problem is not corrected within 90 days, the grantee will be designated as deficient and will be required to correct this deficiency within a specified period of time that, generally, will not exceed 90 additional days. Failure to correct any identified deficiency will, as required by law, result in ACF initiating proceedings to terminate the agency’s Head Start grant, in whole or in part.
Enrollment problems identified during a monitoring review will be treated as a non-compliance finding, subject to the above process, unless the Regional Office believes that the problem is of such scope and severity that it should immediately be treated as a deficiency.

If your program is considering changing your program’s design or enrollment, the changes will eventually require ACF approval. We encourage you to contact your ACF regional office early to discuss these changes.

In summary, the Head Start Bureau, in conjunction with the ACF Regional Offices, intends to move aggressively in the coming months to assure that each of the 909,000 children whom grantees have been funded to serve will, in fact, receive the benefits of Head Start. Thank you for your continuing commitment to Head Start.

/s/
Joan E. Ohl
Commissioner

Eligibility Requirements

- **Age Eligibility** – 1305.4(b)
- **Income Eligibility** – 1305.4(c)
- **Categorical Eligibility** – 1305.4(f)
Income Eligibility Allowances for American Indian/Alaska Native Grantees 1305.4(e)(i-iv)

- May fill more than 10% of its enrollment with participants whose family incomes exceed the low-income guidelines or who are not categorically eligible, IF:
  - The program has served all pregnant women or children who wish to be enrolled from Indian and non-Indian families living on the reservation who either meet low-income guidelines or who are categorically eligible;
  - The tribe has resources within its grant or from other non-Federal sources, without using additional fund from HHS intended to expand EHS or HS services to enroll pregnant women or children whose family incomes exceed low-income guidelines or who are not categorically eligible; and
  - At least 51% of the program’s participants are either income or categorically eligible.
Recruitment Definition 1305.2

“The systematic ways in which a Head Start program identifies families whose children are eligible for Head Start services, informs them of the services available, and encourages them to apply for enrollment in the program.”
Selection Definition 1305.2

“The systematic process used to review all applications for Head Start services and to identify those children and families that are to be enrolled in the program.”
Homeless Children Definition

“Homeless children means the same as homeless children and youths in section 725(2) of the McKinney-Vento Homeless Assistance Act at 42 U.S.C. 11434a(2).

- Homeless children lack a fixed, regular, and adequate nighttime residence (within the meaning of section 103(a)(1)) and includes children who share housing with other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; are abandoned in hospitals; or are awaiting foster care placement; who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings (within the meaning of section 103(a)(2)(C));
Homeless Children Definition, continued

“Homeless children means the same as homeless children and youths in section 725(2) of the McKinney-Vento Homeless Assistance Act at 42 U.S.C. 11434a(2).

- (iii) children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and
- (iv) migratory children (as such term is defined in section 1309 of the Elementary and Secondary Education Act of 1965) who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii). The definition in this regulation also applies to Migrant or Seasonal Head Start programs.
Mountain in Switzerland – 14,692 feet

Matterhorn Mountain
Verifying Categorical Eligibility 1305.4(j)

- Court order or other legal or government-issued document or a written statement from a government child welfare official demonstrating the child is in foster care;
- A written statement from a homeless services provider, school personnel, or other service agency attesting the child is homeless.
Verify Definition 1305.2

“To check or determine the correctness or truth by investigation or by reference.”
Process Overview for Verifying Eligibility
1305.4(a)(i-iii)

• Conduct an in-person interview;
• During the in-person interview verify:
  – Age of the Child 1305.4(h)
  – Family Income 1305.4(i)
  – Categorical Eligibility 1305.4(j)
• Create an eligibility determination record for each enrolled participant signed and dated by the staff person determining eligibility.
Process Overview for Verifying Eligibility
1305.4(a)(2)

- Program staff may interview the family over the telephone if an in-person interview is not possible.
  - ***Program staff must note in the eligibility determination record reasons why the in-person interview was not possible.
No Income Declaration Verification 1305.4(3)

- If the family reports no income for the relevant time period, a program may:
  - accept the family’s signed declaration to that effect, if program staff:
    - describes efforts made to verify the family’s income;
    - explains how the family’s total income was calculated;
  - or,
    - seeks information from third parties about the family’s eligibility, if the family gives written consent.
Recruitment and Enrollment of Children with Disabilities

• **Head Start Act 640(d)(1)**
  - Not less than 10% of the total number of children actually enrolled by each Head Start agency will be children with disabilities who are determined to be eligible for special education and related services, or early intervention services as appropriate and determined under IDEA.

• **Head Start Performance Standards 1308.5**
  - Must not deny placement
  - Access resources and plan for placement options, use of resource staff and training to ensure appropriate placement for the child according to the IEP and is not denied enrollment
  - Priority for those most in need of the services, apply to children with disabilities
Program Policies and Procedures on Violating Eligibility Determination Regulations

1305.4(m) – Describe all actions taken against staff who intentionally violate Federal and program eligibility determination regulations and who enroll pregnant women and children that are not eligible to receive Early Head Start or Head Start services.
Training for Staff, Policy Council and Tribal Council

1305.4(n) – Must train all governing body, policy council, management and staff who determine eligibility on applicable Federal regulations and program policies and procedures. Training must, at a minimum include:

- Methods for collecting complete and accurate information from families and third party sources;
- Strategies for treating families with dignity and respect and for dealing with possible issues of domestic violence, stigma, and privacy; and
- Program policies and procedures that describe actions taken against staff, families, or participants who intentionally attempt to provide or provide false information.
Timelines for Training

Governing Bodies – within 180 days of March 12, 2015 and within 180 days of the beginning of the term of a new governing body and Policy Council

Management and Staff Who Determine Eligibility – within 90 days of March 12, 2015 and within 90-days of hire.
Attendance

Maintaining monthly average daily attendance (ADA) to at least 85%.

- 1305.8(a) - Analyzing the causes of absenteeism
- 1305.8(b) - When to initiate family support
- 1305.8(b) - Four or more consecutive unexcused absences – must conduct home visit or other direct contact with family.
- 1305.8(c) - Determining when excessive absenteeism is considered an enrollment vacancy
Earth’s Highest Mountain – 29,029 feet

Mount Everest
ERSEA Records Keeping System Check

1. Does your record-keeping system include required information on children, families and program services? How could it be improved?

2. Do you use technology to ensure efficient record-keeping and reporting accurate reports for enrollment and attendance analysis? For monthly reporting of enrollment and attendance to Policy Council and Tribal Council?

3. How are you using the Community Assessment to determine service areas? Selection criteria? Recruitment area? Finding children with potential or diagnosed disabilities?

4. How do you ensure quality control of your record-keeping system through ongoing monitoring and program oversight?
Resources:


45 CFR 1305 Eligibility, Recruitment, Selection, Enrollment, and Attendance in Head Start at: http://eclkc.ohs.acf.hhs.gov/hslc/standards/hspps/1305

45 CFR 1308.5 Recruitment and Enrollment of Children with Disabilities at: http://eclkc.ohs.acf.hhs.gov/hslc/standards/hspps/1308/1308.5%20%20Recruitment%20and%20enrollment%20of%20children%20with%20disabilities..htm