




Approval of the Head Start and Early Head Start Program Policy Updates



HEAD START

 2021-2022 Head Start Policy Index		Change Required?	Description and Volume of Change made to current Policy
Disabilities			
1	Individualized Education Program (IEP) for Children with Disabilities	Yes	Included updates to 504 and location of file
Education			
1	Home Visits/ Parent Conferences	Yes	Updates related to documentation and informaiton shared at hte Home Visit and Parent Conference
7	Ongoing Assessment	Yes	Updates to include various types of informal assessments
8	Child's Classroom File/ Portfolio	Yes	Significant changes related to the requirements of the Child File/Portfolio
9	Multidisciplinary Staffing	Yes	Minor change in language regarding attendee documentation
13	Classroom Observations	Yes	Minor revisions and clarificaion related to observation area
16	Learning During Mealtime	Yes	Clarificaiton related to program
19	Behavior Consultation	Yes	Included information regarding timeline
Environmental Health and Safety			
2	Staffing and Class Size Requirements	Yes	Minor change added a period.- Does not need HSPC approval
3	Hygiene Practices	Yes	Added updates related to guidance
10	Rest Time Arrangements	Yes	Added updates related to guidance, added a comma
Program Design and Management (PDM)			
1	Program Monitoring	Yes	Changed Quality Improvement Plan to Corrective Action Plan- Reworded Annual Self Assessment paragraph - added that ISDs need to submit an annual monitoring calendar.
15	Staff Health Requirements	Yes	Added a space between two words - Does not need HSPC approval
18	Program Data- Access and Security	Yes	Updated training list to align with COSA practices
19	Management of Program Data	Yes	Updated training list to align with COSA practices

	DHS Head Start Program Policy		
DISABILITIES 1			
SUBJECT	Individualized Education Program (IEP) for Children with Disabilities		
REFERENCE	Disabilities Services		
EFFECTIVE	6/15/2011		
Policy Council Approval: 4/23/19	Policy Council Revision: 4/23/19	Governing Body Approval: 5/23/19	Governing Body Revision: 5/23/19
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Policy:

Every effort must be made to ensure a child identified with a disability fully participate in all program activities. The information provided in the child's Individualized Education Plan (IEP) or 504 plan will be used when planning individualized strategies and activities for children with disabilities.

Education Service Providers must implement the IEP on the date determined by the Admissions Review and Dismissal Committee by modifying the child's program in accordance with the IEP and arranging for the provision of related services to accommodate the unique strengths, needs, interests, and cultural and linguistic background of the child. The Education Service Provider Disability Coordinator will work with staff and families to ensure children are working toward the goals in their IEP.



Upon request, the Education Service Provider Disability Coordinator will review planned IEP strategies/activities with teaching staff during a coaching/technical assistance session. If a child enters Head Start with a valid IEP, Education Service Providers will follow school district guidelines regarding special education services. .

Education Service Providers will develop and implement procedure to ensure a copy of a child's IEP and/or the *Goals and Objectives/Modifications Sheet* or 504 Plan information is maintained in the classroom and accessible to the teacher, instructional assistant, substitute, and City of San Antonio staff as needed. Confidentiality of information must be maintained at all times.

The child's disability information and copies of required documents will be entered into ChildPlus according to the *City of San Antonio Benchmark Due Date Guide, Head Start Child File Scan Order and Process Guide, and applicable ChildPlus Data Entry Guide*.

Performance Standard(s):

1302.61; 1302.62; 1302.63; 1303.75

	DHS Head Start Program Policy		
EDUCATION 1			
SUBJECT	Home Visits/Parent Conferences		
REFERENCE	Education and Early Childhood Development		
EFFECTIVE	6/23/2015		
Policy Council Approval: 4/23/19	Policy Council Revision: 4/23/19	Governing Body Approval: 5/23/19	Governing Body Revision: 5/23/19
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Policy:

Head Start teachers must complete two Home Visits and two Parent/Teacher Conferences each school year.

Education Service Providers will develop and implement procedures to ensure the completion dates of the Home Visits and Parent/Teacher Conferences are entered into ChildPlus and meet the *City of the San Antonio Benchmark Due Date Guide, ChildPlus File Scan Order and Process Guide*, and applicable *ChildPlus Data Entry Guide* Procedures must include accommodations for long term substitutes and/or extenuating circumstances.

The first Home Visit may be completed by the teacher no more than four weeks prior to the first day of a child's entry into school. If a child enters the program after January 1, a minimum of one Home Visit and one Parent/Teacher Conference must be completed by the last day of school. Documentation of the Home Visits and Parent/Teacher Conferences must be maintained in ChildPlus. If a Home Visit or Parent Conference did not occur, documentation regarding why the event did not occur must be noted in ChildPlus according to the *ChildPlus Data Entry Guide*.

Home Visits and Parent/Teacher Conferences will be conducted in the family's home language and, when necessary, using the services of an interpreter. The Home Visits and Parent/Teacher Conferences should be scheduled at the parent's/guardian's convenience and if necessary, at a neutral location.



Home Visits and Parent/Teacher Conferences offer opportunities for parents/guardians and staff to share knowledge related to the strengths, needs, interests, and concerns regarding the child and family. . During the Home Visits and Parent/Teacher Conferences the teacher will share work samples and applicable information related to assessment and student outcomes, behavioral and developmental screenings, , program activities, and

transitioning into Kindergarten..

Education Service Providers will develop and implement procedures to ensure that the information shared at the Home Visits and Parent/Teacher Conferences is documented and shared with the parent/guardian.

Performance Standard(s):

1302.34 (b)(2-3, 7-8); 1302.46; 1302.50; 1302.71(a, b, e)

	DHS Head Start Program Policy		
EDUCATION 7			
SUBJECT	Ongoing Assessment		
REFERENCE	Education and Early Childhood Development		
EFFECTIVE	8/2/2011		
Policy Council Approval: 4/23/19	Policy Council Revision: 4/23/19	Governing Body Approval: 5/23/19	Governing Body Revision: 5/23/19
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Policy:

Education Service Providers will administer a formal assessment that is research based and aligned with the Head Start Early Learning Outcomes Framework (HSELOF) and Texas Prekindergarten Guidelines. The assessment will be conducted three times during the year in the child's home language.

The data will be aggregated, analyzed, and reported according to the *City of the San Antonio Benchmark Due Date Guide*. Education Service Providers will be responsible for submitting requested reports and analysis on mandated outcomes.



Education Service Providers develop and implement procedures to ensure teachers have a system to collect and document ongoing informal assessments, including student portfolios and work samples, used to evaluate child progress and inform instruction.

Performance Standard:

1302.33

Head Start Act:

642(f)(5)(c)

	DHS Head Start Program Policy		
EDUCATION 8			
SUBJECT	Child Classroom File/ Portfolio		
REFERENCE	Education and Early Childhood Development		
EFFECTIVE	8/2/2011		
Policy Council Approval: 4/23/19	Policy Council Revision: 4/23/19	Governing Body Approval: 5/23/19	Governing Body Revision: 5/23/19
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Policy:

Education Service Providers will develop and implement procedures that ensure each child has a Child Classroom File/Portfolio that is organized and contains multiple sources of information used for ongoing assessment and instructional planning. The Child Classroom File/Portfolio must contain at a minimum, work samples from throughout the school year.

The Education Service Providers will develop and implement procedures describing the location and format of the Child Classroom File/Portfolio and ensuring the Child Classroom File/Portfolio is kept confidential and accessible to parents/guardians and staff upon request.

Performance Standard(s):

1302.30-1302.34

	DHS Head Start Program Policy		
EDUCATION 9			
SUBJECT	Multidisciplinary Staffing		
REFERENCE	Education and Early Childhood Development		
EFFECTIVE	8/2/2011		
Policy Council Approval: 4/24/18	Policy Council Revision: 4/24/18	Governing Body Approval: 5/23/19	Governing Body Revision: 5/23/19
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Policy:



Education Service Providers will develop and implement procedures for regular communication among program staff to facilitate quality outcomes for children and families. Education Service Providers will schedule at least two Multidisciplinary Staffing (MDS) meetings annually for every enrolled child. If a child enters the program after December 31st, a minimum of one MDS meeting will be held before the last day of the program year.

The MDS meeting is a documented and planned communication tool utilized to create a cohesive team approach to discuss the strengths and needs of children and families. The Campus Administrator or designee, Family Support Staff or designee, and Teachers are required to participate in the MDS. Content area coordinators responsible for Education, Health, ERSEA, Mental Health, Transportation, Nutrition, Disabilities, and other related services may be required to attend based on the child/family needs.

Each Education Service Provider will establish and maintain record-keeping systems to provide accurate and timely information regarding children, families, and staff and must ensure appropriate confidentiality of this information. The MDS documentation must include the completion date of the MDS, list of all in attendance, and topics covered. Procedures must be in place to ensure that MDS completion dates and documents are entered and scanned into ChildPlus according to the *City of the San Antonio Benchmark Due Date Guide*, applicable *ChildPlus Data Entry Guide*, and the *Head Start File Scan Order and Process Guide*.

Performance Standard(s):

1302.33; 1302.34; 1302.101(b)(2-3)

	DHS Head Start Program Policy		
EDUCATION 13			
SUBJECT	Classroom Observations		
REFERENCE	Education and Early Childhood Development		
EFFECTIVE	10/15/2013		
Policy Council Approval: 4/23/19	Policy Council Revision: 4/23/19	Governing Body Approval: 5/23/19	Governing Body Revision: 5/23/19
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Policy:



Education Service Providers must ensure that all classrooms are in compliance with the Grantee and school district standards, policies, and guidance. Education Service Providers will develop and implement procedures for conducting and documenting monthly observations in each classroom by designated staff including, but not limited to coordinators, coaches, specialists, directors, site administrators, etc.

Education Service Providers will review (at a minimum) the following areas throughout the program year:

- Indoor classroom environment
- Outdoor classroom environment
- Health & Safety
- Curriculum implementation and fidelity
- Teacher/ child interactions and relationships
- Nutrition
- Individualization
- Family Engagement

Performance Standard:

1302.92

	DHS Head Start Program Policy		
EDUCATION 16			
SUBJECT	Learning During Mealtime		
REFERENCE	Education and Early Childhood Development		
EFFECTIVE	6/18/2014		
Policy Council Approval: 4/23/19	Policy Council Revision: 4/23/19	Governing Body Approval: 5/23/19	Governing Body Revision: 5/23/19
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Policy:

The Head Start Program recognizes the importance of Family Style Meals during breakfast and lunch in supporting social, emotional, language, gross and fine motor learning and development.

Education Service Providers must develop and implement procedures related to food availability for adults participating in mealtime.

Any adults actively participating with the class during mealtime should share the same food as the children, free of charge, including during field trips and other Head Start related activities. Any adult receiving food, paid for by the Head Start Program, must be involved in the meal with the students at some point during the scheduled meal service.

Ratio must be maintained during mealtime and at a minimum, one adult should sit with the children during the majority of the meal service.

Children are not required to sit at one table or all at the same table. However, children must not be isolated or sit alone during mealtime.



The current daily menu must be posted and made available to parents/guardians.

Each Education Service Provider will develop and implement procedures to address mealtime that includes the following:

- Role of adults, including teachers, teaching assistants, floaters, substitutes, volunteers, and parents/guardians
- Role of the children, including setting the table, passing out food, and helping with clean up
- Training for staff regarding learning opportunities during mealtime

Performance Standard(s):

1302.31 (e)(2); 1302.44

	DHS Head Start Program Policy		
EDUCATION 19			
SUBJECT	Behavior Consultation		
REFERENCE	Education and Early Childhood Development		
EFFECTIVE	6/27/2017		
Policy Council Approval: 4/23/19	Policy Council Revision: 4/23/19	Governing Body Approval: 5/23/19	Governing Body Revision: 5/23/19
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Policy:

Education Service Providers will develop and implement procedures to ensure Behavior Coaches provide consultation and support to teaching staff.



Procedures must include:

- A system for staff to request assistance
- A system to determine the type and level of support for children and staff within 30 school days from date of request
- Regular communication among program staff, including the Disability Coordinator, assigned Instructional Coach/Education Specialist, Education Service Provider Mental Health Coordinator, Family & Community Support Team, COSA Wellness Support Team, campus administrator, and other applicable team members, to facilitate quality outcomes for children
- A coaching system that includes a cycle of observations, feedback, and goal setting and tools used to document the cycle

Requests for assistance, behavior consultations, and behavior coaching must be documented in ChildPlus according to the *City of San Antonio Benchmark Due Date Guide* and applicable *ChildPlus Data Entry Guide*.

Performance Standard:

1302.92

	DHS Head Start Program Policy		
EnvHS 2			
SUBJECT	Staffing and Class Size Requirements		
REFERENCE	Environmental Health and Safety		
EFFECTIVE	3/13/2012		
Policy Council Approval: 4/23/19	Policy Council Revision: 4/23/19	Governing Body Approval: 5/23/19	Governing Body Revision: 5/23/19
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Policy:

All Head Start classrooms must be staffed by two paid staff persons: a teacher and an aide/instructional assistant/paraprofessional or two teachers. The program will maintain appropriate staffing during Head Start program hours except for brief absences of a teaching staff member for no more than five minutes to accommodate for a teacher or child's needs. One teacher or staff member may accompany a small group of children away from the group for a brief period of time, not to exceed a ratio of 1:10, to accommodate for program needs, such as onsite clinics, special events, child restroom breaks, etc.

Head Start Program hours vary by site and are set and approved at the beginning of the program year as part of the Education Service Provider's Program Design.



A class that serves a majority of children who are three years olds, must have no more than 17 children. A class that serves a majority of children who are four and five years old, must have no more than 20 children. Class sizes are determined based on square footage, with a minimum of 35 square feet/child.

The predominant age of the class must be established at the start of each program year and is based on the age of the majority of the children in the classroom. Intact and separate 3 year-old and 4 year-old classes will be established prior to the beginning of the school year, or by September 1st, in order to create a developmentally appropriate learning environment for all children. The establishment of mixed age group classes or changes to the classroom age group designation must be authorized by the Grantee.

A volunteer may be used to maintain the required teacher/student ratio only for short periods of time, 10-15 minutes, to accommodate for unscheduled interruptions/emergencies. A volunteer must never be left alone with children. All volunteers must sign the Head Start Standards of Conduct, pass a background check, and receive volunteer training. Education Service Providers must maintain documentation of volunteer training, background checks, and Standards of Conduct.

Performance Standard(s):

1302.21(b)(1-4); 1302.94(b)

	DHS Head Start Program Policy		
EnvHS 3			
SUBJECT	Hygiene & Cleaning Practices		
REFERENCE	Environmental Health and Safety		
EFFECTIVE	6/15/2011		
Policy Council Approval: 7/28/20	Policy Council Revision: 7/28/20	Governing Body Approval: 8/13/20	Governing Body Revision: 8/13/20
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Policy:

Education Service Providers must develop and implement procedures to promote safe food preparation, appropriate hand washing hygiene and standard precautions, and sanitation and disinfecting of the classroom, including equipment and materials. Staff must be trained on procedures and documentation of training must be maintained.

Education Service Providers will follow guidance from the Office of Head Start (OHS) or recommendations made by the Centers for Disease Control and Prevention, State of Texas, the Texas Education Agency, the City of San Antonio Metro Health Department, and/or Caring for Our Children National Health and Safety Standards Guidelines for Early Care and Education Programs when establishing procedures for hygiene, cleaning, disinfecting, and sanitation practices.

Performance Standard:

1302.47(b)(6) (i-iii)

	DHS, Head Start Program Policy		
EnvHS 10			
SUBJECT	Rest Time Arrangements		
REFERENCE	Environmental Health and Safety		
EFFECTIVE	07/25/2017		
Policy Council Approval: 4/23/19	Policy Council Revision: 4/23/19	Governing Body Approval: 5/23/19	Governing Body Revision: 5/23/19
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Policy:



Education Service Providers will provide the opportunity for children to rest or nap every day. A child is not required to sleep during rest time. Education Service Providers must ensure that quiet learning activities are provided for children who do not want or need to sleep.

All Head Start children are provided an individual mat, cot, or bed that is waterproof or washable. Mats, cots, or beds must be used in accordance with all appropriate Head Start regulations and performance standards, Centers for Disease Control and Prevention, Texas Education Agency, Caring for Our Children: National Health and Safety Performance Standards, and Texas Health and Human Services Commission/Child Care Licensing Minimum Standards for Child Care Centers.

Education Service Providers will develop and implement procedures on individual mat assignments, proper sleep arrangements, storage, and cleaning/sanitizing, so as to prevent the spread of infectious diseases and illnesses.

Performance Standard(s):

1302.21(d)(1), 1302.31(e)(1), 1302.47(a)

	DHS Head Start Program Policy		
PDM 1			
SUBJECT	Program Monitoring		
REFERENCE	Program Design and Management		
EFFECTIVE	5/11/2010		
Policy Council Approval: 4/23/19	Policy Council Revision: 4/23/19	Governing Body Approval: 5/23/19	Governing Body Revision: 5/23/19
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Policy:

The Head Start Program will develop and implement a process of ongoing monitoring and continuous improvement of the service delivery and program operations. The City of San Antonio Head Start (City) and Education Service Providers will abide by all local, state, and federal regulations. The Head Start Program will provide high-quality program services, share strategies, and communicate plans to ensure child and adult safety.

The Head Start Program will use the following monitoring systems:

- Education Service Provider level monitoring system for ongoing monitoring to include regular site visits to all Head Start sites and classrooms
- Site visits to all Head Start centers will be announced and unannounced
- City level monitoring system that ensures Education Service Providers have effective oversight of service delivery systems and remain in compliance with all local, state, and federal regulations
- Utilization of ChildPlus by the City and Education Service Providers to collect and record information about children and families for data analysis, evaluation, and program improvement
- Collaborative review of program information for planning and future development
- Annual Self-Assessment
- Managed by Information (MBI) Reporting
- Content Area Data Reports

City Program Responsibilities:

The City will develop procedures for ongoing monitoring of the Head Start Program. These procedures will provide guidance and expectations of how Education Service Providers will be monitored. These procedures will also include the requirements for reporting findings.

The City will establish a monitoring model that will help ensure timely and effective delivery of services and provide content area expertise and support to the Education Service Providers. The City will focus on direct monitoring, reviewing, and validating the results of Education Service Providers monitoring activities.

The City will monitor required program tasks and responsibilities to ensure completion within required timelines and according to guidelines provided in the Head Start Program Performance Standards, local, state, and federal regulations.

Monitoring of the Head Start Program is a continuous process and all findings are shared with the Head Start Administrator to determine the level of compliance with the Head Start Program Performance Standards, local, state, and federal regulations. The results of ongoing monitoring will be shared with the Head Start Administrator, Leadership Team, Management Team, the governing body and the Policy Council.

The City will follow up on monitoring issues or concerns to ensure corrections and implementation of corrective actions plans. The City may provide training, technical assistance, and resources to assist the Education Service Providers in developing and implementing a corrective action and quality improvement plan.

The City will establish an annual monitoring calendar of monitoring activities and will share with the Education Service Providers.

With the participation of stakeholders, Head Start parents, Policy Council members, Governing Body members, community members, and program staff, the City will conduct the Annual Self-Assessment by utilizing program data. The results will be shared with all stakeholders.

Education Service Provider Responsibilities:

Education Service Providers are responsible for establishing their own monitoring systems in accordance with Head Start Program Performance Standards and the City of San Antonio Head Start Policies. Education Service Providers are responsible for the following:

- Developing and implementing procedures for ongoing monitoring
- Submitting an annual monitoring calendar to the City
- Taking corrective action
- Requesting assistance from the City when needed
- Reporting the results of monitoring to the City
- Implementing a corrective action plan that prevents reoccurrence of previous findings

Education Service Providers will develop and implement a procedure to monitor and report results in the following areas:

- Education Services
- ERSEA
- Health/Dental Services
- Nutrition
- Disabilities

- Mental Wellness Support Services
- Family & Community Support Services
- Transportation
- Environmental Health and Safety
- Human Resources

Education Service Providers will utilize their internal monitoring systems, to include ChildPlus, to document all results. Upon request by the City, all monitoring documents must be made available within reasonable time.

Education Service Provider Corrective Action:



Following the receipt of results from a monitoring project completed by the City, the Education Service Providers will:

- Complete all Corrective Action Plans (CAPs) in ChildPlus based on set deadlines established by the City
- Address any finding related to child health and safety that is an immediate threat within 24 hours
- Develop quality improvement plans as requested by the City

The Education Service Provider may request an extension prior to the initial deadline along with justification if they are unable to meet the deadline for the completion of a CAP. The Special Projects Manager over City Monitoring or Head Start Administrator may give permission and/or add provisions related to the CAPs and approve as needed.

Performance Standard(s):

Subpart J- Program Management and Quality Improvement
1302.100 – 1302.103 (a-b)

	DHS, Head Start Program Policy		 HEAD START City of San Antonio Department of Human Services
PDM 15			
SUBJECT	Staff Health Requirements		
REFERENCE	Program Design and Management		
EFFECTIVE	6/15/2011		
Policy Council Approval: 4/24/18	Policy Council Revision: 4/24/18	Governing Body Approval: 8/17/18	Governing Body Revision: 8/17/18
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Policy:

The Head Start Program will develop and implement procedures requiring identified program staff to submit a copy of their most recent physical exam or approved health document within 30 business days of hire to ensure that staff do not pose a significant risk to the health or safety of others in the program. The annual/physical exam or approved health document must not be more than 12 months old and must include appropriate screenings or tests for Tuberculosis or other communicable diseases as recommended by a healthcare professional.



Every five years after the initial hire date, staff must submit a copy of their most recent physical exam or approved health document. The physical exam or approved health document must not be more than 12 months old and must include appropriate screenings or tests for Tuberculosis or other communicable diseases as recommended by a healthcare professional.

The Head Start Program, including the Grantee and Education Service Providers, will develop and implement procedures to ensure regular volunteers complete appropriate screenings or tests for Tuberculosis or other communicable diseases as recommended by a healthcare professional.

Documentation of health exams, screenings, and/or tests must be kept on file.

Performance Standard(s):

1302.93; 1302.94

	DHS, Head Start Program Policy		
PDM 18			
SUBJECT	Program Data - Access and Security		
REFERENCE	Program Design and Management		
EFFECTIVE	April 23, 2018		
Policy Council Approval: 1/22/19	Policy Council Revision: 1/22/19	Governing Body Approval: 2/28/19	Governing Body Revision: 2/28/19
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Policy:

The Head Start Program, including Grantee and Education Service Provider, must establish an internal procedure for proper access and security of program data for the City of San Antonio Department of Human Services Head Start and Early Head Program (DHS Head Start).

Procedure:

DHS Head Start utilizes ChildPlus as the secure database system for storing and tracking client information.

All user account holders are required to complete ChildPlus Access Request and ChildPlus User Security and Confidentiality Agreement forms. Upon completion, the forms are scanned and attached by the ChildPlus Administrator in ChildPlus under each respective user profile.

By accessing the database, staff understands and agrees to abide by all terms of the ChildPlus User Security and Confidentiality Agreement and any applicable state and federal laws regarding Personally Identifiable Information (PII) and Protected Health Information (PHI).

- Education Service Providers are required to designate a staff member to complete the Personnel Profile for all staff members funded by the Head Start or EHS-CCP grant or anyone who works with children or families enrolled in the Head Start or EHS-CCP programs under the Management Module in ChildPlus. Designated staff is defined as preauthorized users in the Management/Personnel Module.
- Upon completion of the Personnel Profile, the designee will notify the ChildPlus Administrator if the user requires access to PII. Not all personnel require a ChildPlus user account.
- The ChildPlus Administrator will confirm with the designee the role of personnel and the types of access required.

- The ChildPlus Administrator will complete a User Security profile in ChildPlus, assign a login username and temporary password, restrict access by location, and designate User Security group(s).
- The ChildPlus Administrator will email the new account holder the login username and temporary password.
- The new account holder will log into ChildPlus and change the temporary password to a permanent password.

Authorized ChildPlus users are granted access under one of the following groupings:

- Staff: A ChildPlus personnel account will be created for all staff. ChildPlus user accounts and access is granted upon the approval of the ChildPlus Access Request Form and the completion of the ChildPlus User Security and Confidentiality Agreement Form.
- Education Service Providers: An assigned ChildPlus Super User for each Service Provider formally requests accounts via email for Service Provider Head Start Staff. Service providers are subject to the confidentiality provisions under the Family Educational Rights and Privacy Act (FERPA).
- Contracted Providers: A Special Projects Manager or designee will request user accounts for contractual providers via email or meeting with the ChildPlus Administrator. To meet the requirements of HIPAA, DHS Head Start requires any contract that include access to client information include an enforceable Business Associate Agreement (BAA). BAAs are documented in the professional services contract with the DHS Head Start.

Implementation of technical policies and procedures for electronic information systems that maintain electronic PII, PHI, and IDEA Part B and C to allow access only to those persons or software programs that have been granted access rights.

All DHS Head Start staff, regardless of position, share the responsibility to safeguard HIPAA, FERPA, PHI, PII, and the Individuals with Disabilities Education Act (IDEA) Part B and C data from unauthorized access, acquisition or disclosure. Staff that share PHI, PII and IDEA Part B and C electronically must ensure the receiving entity is an authorized recipient of the specific data being delivered.

Only computers configured by ITSD for use on the CoSA network are authorized for accessing ChildPlus.

Staff may utilize a program issued computer or device to access ChildPlus.

Staff ensures the environment in which they are working is secure and only authorized persons are within viewing distance of the authorized user's screen.

Disclosure ChildPlus information to a contractor is authorized but ONLY when an enforceable

Business Associate Agreement (BAA) is in place.

All DHS Head Start staff must successfully complete the following trainings:



- COSA Monthly Security Awareness Training
- COSA Monthly HIPPA Training
- Completion of these trainings are documented and maintained by the City of San Antonio Human Resources Department.

All DHS Head Start staff must successfully review and acknowledge review and acceptance of CoSA Administrative Directives that include Data Security and Use of Technology.

Education Service Providers and contractors must develop and implement procedures to ensure all staff comply with this procedure and ensure all staff receive training on safeguarding FERPA, HIPAA, PHI, PII and (IDEA) Part B and C data.

Performance Standard:

1302.101(b)(4)

	DHS, Head Start Program Policy		
PDM 19			
SUBJECT	Management of Program Data		
REFERENCE	Program Design and Management		
EFFECTIVE	April 23, 2018		
Policy Council Approval: 1/22/19	Policy Council Revision: 1/22/19	Governing Body Approval: 2/28/19	Governing Body Revision: 2/28/19
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Policy:

The Head Start Program, including the Grantee and Education Service Providers, must establish an internal procedure for proper management of program data for the City of San Antonio Department of Human Services Head Start and Early Head Start Program (DHS Head Start).

Procedure:

Implementation of technical policies and procedures for electronic information systems that maintain electronic PII, PHI, and IDEA Part B and C to allow access only to those persons or software programs that have been granted access rights.

All DHS Head Start staff, regardless of position, share the responsibility to safeguard FERPA, HIPAA, PHI, PII, and the Individuals with Disabilities Education Act (IDEA) Part B and C data from unauthorized access, acquisition, or disclosure. Staff that share PHI, PII and IDEA Part B and C electronically must ensure the receiving entity is an authorized recipient of the specific data being delivered.

- Only computers configured by ITSD for use on the CoSA network are authorized for the storage or transport of PHI, PII and/or IDEA Part B and C data.
- Staff may utilize a program issued device to access systems to view and maintain PHI, PII, and IDEA Part B and C files.
- Staff ensures the environment in which they are working is secure and only authorized persons are within viewing distance of the authorized user's screen.
- Disclosure of PII and/or PHI, and/or IDEA Part B and C to a contractor is authorized but ONLY when an enforceable Business Associate Agreement (BAA) is in place.
- Personal devices shall not be used to store or transmit unencrypted protected data.
- Any removable media or storage devices used to transfer PHI, PII, and/or IDEA Part B and C data must be encrypted.

- If any PHI, PII, and/or IDEA Part B and C data is transmitted via email attachment, the attachment must be protected by a password. The password to access the attachment must be sent to the recipient in a separate email.
- Hard copies (i.e., paper) of any PHI, PII, and/or IDEA Part B and C data must be kept secured in a lockable file cabinet or other secured storage.
- In the event that PHI, PII, and/or IDEA Part B and C data, either hard copy or electronic, are transported between locations, staff must take all precautions to ensure the materials remain secure and must remain in the presence of staff at all times.

Facsimiles

- Any documents received via facsimile, either telefax or online, that contain PHI, PII and/or IDEA Part B and C data shall be uploaded or scanned into appropriate software (i.e., ChildPlus) as soon as possible. Any electronic copies of the facsimile should be saved to the user's desktop; once the upload is completed the file should be deleted and the deletion confirmed. Any hardcopies of the facsimile must be stored in a secure location or destroyed.
- Any hardcopies of the documents sent via facsimile, either telefax or online, that contain PHI, PII and/or IDEA Part B and C data shall be either stored in a secure location or destroyed.

All DHS Head Start staff must successfully complete the following trainings annually:

- COSA Monthly Security Awareness Training
- COSA Monthly HIPPA Training
- CoSA Employee Security Awareness Day in the Life online training module



Completion of these trainings are documented and maintained by the City of San Antonio Human Resources Department.

All DHS Head Start staff must successfully review and acknowledge review and acceptance of CoSA Administrative Directives that include Data Security and Use of Technology.

Education Service Providers and contractors must develop and implement procedures to ensure all staff comply with this procedure and receive training on safeguarding FERPA, HIPAA, PHI, PII and IDEA Part B and C data.

Performance Standard:

1302.101(b)(4)

	DHS Head Start Program Policy		
DISABILITIES 1			
SUBJECT	Individualized Education Program (IEP) for Children with Disabilities		
REFERENCE	Disabilities Services		
EFFECTIVE	6/15/2011		
Policy Council Approval: 4/23/19	Policy Council Revision: 4/23/19	Governing Body Approval: 5/23/19	Governing Body Revision: 5/23/19
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Policy:

Every effort must be made to ensure a child identified with a disability fully participate in all program activities. The information provided in the child's Individualized Education Plan (IEP) or 504 plan will be used when planning individualized strategies and activities for children with disabilities.

Education Service Providers must implement the IEP on the date determined by the Admissions Review and Dismissal Committee by modifying the child's program in accordance with the IEP and arranging for the provision of related services to accommodate the unique strengths, needs, interests, and cultural and linguistic background of the child. The Education Service Provider Disability Coordinator will work with staff and families to ensure children are working toward the goals in their IEP.



Upon request, the Education Service Provider Disability Coordinator will review planned IEP strategies/activities with teaching staff during a coaching/technical assistance session. If a child enters Head Start with a valid IEP, Education Service Providers will follow school district guidelines regarding special education services. .

Education Service Providers will develop and implement procedure to ensure a copy of a child's Copies of the IEP and/or the Goals and Objectives/Modifications Sheet or 504 Plan information will be is maintained in the classroom and accessible to the teacher, instructional assistant, substitute, and City of San Antonio staff as needed. in the child's Classroom File and/or Portfolio. The IEP may be kept in a different location in the classroom, however, the location of the IEP, must be noted within the child's Classroom File and/or Portfolio. Confidentiality of information must be maintained at all times.

The child's disability information and copies of required documents will be entered into ChildPlus according to the *City of San Antonio Benchmark Due Date Guide, Head Start Child File Scan Order and Process Guide, and applicable ChildPlus Data Entry Guide.*

Performance Standard(s):

1302.61; 1302.62; 1302.63; 1303.75

	DHS Head Start Program Policy		
EDUCATION 1			
SUBJECT	Home Visits/Parent Conferences		
REFERENCE	Education and Early Childhood Development		
EFFECTIVE	6/23/2015		
Policy Council Approval: 4/23/19	Policy Council Revision: 4/23/19	Governing Body Approval: 5/23/19	Governing Body Revision: 5/23/19
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Policy:

Head Start teachers must complete two Home Visits and two Parent/Teacher Conferences each school year.

Education Service Providers will develop and implement procedures to ensure the completion dates of the Home Visits and Parent/Teacher Conferences are entered into ChildPlus and meet the *City of the San Antonio Benchmark Due Date Guide, ChildPlus File Scan Order and Process Guide*, and applicable *ChildPlus Data Entry Guide* Procedures must include accommodations for long term substitutes and/or extenuating circumstances.

The first Home Visit may be completed by the teacher no more than four weeks prior to the first day of a child's entry into school. If a child enters the program after January 1, a minimum of one Home Visit and one Parent/Teacher Conference must be completed by the last day of school.

Documentation of the Home Visits and Parent/Teacher Conferences must be maintained in ~~the child's classroom file and~~ ChildPlus. If a Home Visit or Parent Conference did not occur, documentation regarding why the event did not occur must be noted in ChildPlus according to the *ChildPlus Data Entry Guide*.

Home Visits and Parent/Teacher Conferences will be conducted in the family's home language and, when necessary, using the services of an interpreter. The Home Visits and Parent/Teacher Conferences should be scheduled at the parent's/guardian's convenience and if necessary, at a neutral location.



Home Visits and Parent/Teacher Conferences offer opportunities for parents/guardians and staff to share knowledge related to the strengths, needs, interests, and concerns ~~of the~~ regarding the child and family. and program activities. During the Home Visits and Parent/Teacher Conferences the teacher will share work samples and applicable information related to , educational assessment assessment and student outcomes, behavioral and developmental screenings, screening information, program activities, and information

~~regarding the~~ transition ing into Kindergarten, ~~when applicable~~.

Education Service Providers will develop and implement procedures to ensure that the information shared at the Home Visits and Parent/Teacher Conferences is documented and shared with the parent/guardian.

Performance Standard(s):

1302.34 (b)(2-3, 7-8); 1302.46; 1302.50; 1302.71(a, b, e)

	DHS Head Start Program Policy		
EDUCATION 7			
SUBJECT	Ongoing Assessment		
REFERENCE	Education and Early Childhood Development		
EFFECTIVE	8/2/2011		
Policy Council Approval: 4/23/19	Policy Council Revision: 4/23/19	Governing Body Approval: 5/23/19	Governing Body Revision: 5/23/19
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Policy:

Education Service Providers will administer a formal assessment that is research based and aligned with the Head Start Early Learning Outcomes Framework (HSELOF) and Texas Prekindergarten Guidelines. The assessment will be conducted three times during the year in the child's home language.

The data will be aggregated, analyzed, and reported according to the *City of the San Antonio Benchmark Due Date Guide*. Education Service Providers will be responsible for submitting requested reports and analysis on mandated outcomes.



Education Service Providers develop and implement procedures to ensure teachers have a system to collect and document ongoing informal assessments, including student portfolios and work samples, used to evaluate child progress and inform instruction.

Performance Standard:

1302.33

Head Start Act:

642(f)(5)(c)

	DHS Head Start Program Policy		
EDUCATION 8			
SUBJECT	Child Classroom File/ Portfolio		
REFERENCE	Education and Early Childhood Development		
EFFECTIVE	8/2/2011		
Policy Council Approval: 4/23/19	Policy Council Revision: 4/23/19	Governing Body Approval: 5/23/19	Governing Body Revision: 5/23/19
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Policy:

Education Service Providers will develop and implement procedures that ensure each child has a Child Classroom File/Portfolio that is organized and contains multiple sources of information used for ongoing assessment and instructional planning. The Child Classroom File/Portfolio must contain at a minimum, work samples from throughout the school year.

~~The Child's Classroom File/Portfolio will contain the following:~~

- ~~• Documentation from home visits and parent conferences, including parent/guardian input~~
- ~~• Work samples~~
- ~~• Progress reports, if applicable~~
- ~~• Developmental Screening~~
- ~~• Social and Emotional Screening~~
- ~~• Beginning, Middle and End of year formal assessment summary information~~
- ~~• Individual Education Plan (IEP) or 504 Documentation (if applicable)~~
- ~~• Other items pertaining to educational development~~



~~The IEP or 504 documentation may be kept in a different location in the classroom; however, the location of the IEP must be noted within the Child Classroom File/Portfolio. The file must be accessible to parents/guardians and monitors/reviewers, upon request.~~

~~If an online version of the developmental and/or social and emotional screening is completed, a paper copy is not required to be in the Child Classroom File/Portfolio. Documentation that the screening(s) were completed electronically must be noted in the Child Classroom File/Portfolio. If the paper version of either screening was used a complete copy should be included in the Child Classroom File/Portfolio~~

The Education Service Providers will develop and implement procedures to describing the location and format of the Child Classroom File/Portfolio and ensuring the Child Classroom File/Portfolio is located in the teacher's classroom, kept confidential, and available for accessible to parents/guardians and staff to review upon request.

Performance Standard(s):

DRAFT

	DHS Head Start Program Policy		
EDUCATION 9			
SUBJECT	Multidisciplinary Staffing		
REFERENCE	Education and Early Childhood Development		
EFFECTIVE	8/2/2011		
Policy Council Approval: 4/24/18	Policy Council Revision: 4/24/18	Governing Body Approval: 5/23/19	Governing Body Revision: 5/23/19
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Policy:



Education Service Providers will develop and implement procedures for regular communication among program staff to facilitate quality outcomes for children and families. Education Service Providers will schedule at least two Multidisciplinary Staffing (MDS) meetings annually for every enrolled child. If a child enters the program after December 31st, a minimum of one MDS meeting will be held before the last day of the program year.

The MDS meeting is a documented and planned communication tool utilized to create a cohesive team approach to discuss the strengths and needs of children and families. The Campus Administrator or designee, Family Support Staff or designee, and Teachers are required to participate in the MDS. Content area coordinators responsible for Education, Health, ERSEA, Mental Health, Transportation, Nutrition, Disabilities, and other related services may be required to attend based on the child/family needs.

Each Education Service Provider will establish and maintain record-keeping systems to provide accurate and timely information regarding children, families, and staff and must ensure appropriate confidentiality of this information. The MDS documentation must include the completion date of the MDS, ~~list~~signatures of all in attendance, and topics covered. Procedures must be in place to ensure that MDS completion dates and documents are entered and scanned into ChildPlus according to the *City of the San Antonio Benchmark Due Date Guide*, applicable *ChildPlus Data Entry Guide*, and the *Head Start File Scan Order and Process Guide*.

Performance Standard(s):

1302.33; 1302.34; 1302.101(b)(2-3)

	DHS Head Start Program Policy		
EDUCATION 13			
SUBJECT	Classroom Observations		
REFERENCE	Education and Early Childhood Development		
EFFECTIVE	10/15/2013		
Policy Council Approval: 4/23/19	Policy Council Revision: 4/23/19	Governing Body Approval: 5/23/19	Governing Body Revision: 5/23/19
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Policy:



Education Service Providers must ensure that all classrooms are in compliance with the Grantee and school district standards, policies, and guidance. Education Service Providers will develop and implement procedures for conducting and documenting monthly observations in each classroom by designated staff including, but not limited to ~~Coordinators~~coordinators, ~~Coaches~~coaches, ~~Specialists~~specialists, ~~Directors~~directors, ~~Site-site Administrators~~administrators, etc.

Education Service Providers will review (at a minimum) the following areas throughout the program year:

- Indoor classroom environment
- Outdoor classroom environment
- Health & Safety
- Curriculum implementation and fidelity
- Teacher/ child interactions and relationships
- Nutrition
- Individualization
- Family Engagement

Performance Standard:

1302.92

	DHS Head Start Program Policy		
EDUCATION 16			
SUBJECT	Learning During Mealtime		
REFERENCE	Education and Early Childhood Development		
EFFECTIVE	6/18/2014		
Policy Council Approval: 4/23/19	Policy Council Revision: 4/23/19	Governing Body Approval: 5/23/19	Governing Body Revision: 5/23/19
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Policy:

The Head Start Program recognizes the importance of Family Style Meals during breakfast and lunch in supporting social, emotional, language, gross and fine motor learning and development.

Education Service Providers must develop and implement procedures related to food availability for adults participating in mealtime.

Any adults actively participating with the class during mealtime should share the same food as the children, free of charge, including during field trips and other Head Start related activities. Any adult receiving food, paid for by the [Head Start](#) Program, must be involved in the meal with the students at some point during the scheduled meal service.

Ratio must be maintained during mealtime and at a minimum, one adult should sit with the children during the majority of the meal service.

Children are not required to sit at one table or all at the same table. However, children must not be isolated or sit alone during mealtime.



The current daily menu must be posted and made available to parents/guardians.

Each Education Service Provider will develop and implement procedures to address mealtime that includes the following:

- Role of adults, including teachers, teaching assistants, floaters, substitutes, volunteers, and parents/guardians
- Role of the children, including setting the table, passing out food, and helping with clean up
- Training for staff regarding learning opportunities during mealtime

Performance Standard(s):

1302.31 (e)(2); 1302.44

	DHS Head Start Program Policy		
EDUCATION 19			
SUBJECT	Behavior Consultation		
REFERENCE	Education and Early Childhood Development		
EFFECTIVE	6/27/2017		
Policy Council Approval: 4/23/19	Policy Council Revision: 4/23/19	Governing Body Approval: 5/23/19	Governing Body Revision: 5/23/19
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Policy:

Education Service Providers will develop and implement procedures to ensure Behavior Coaches provide consultation and support to teaching staff.



Procedures must include:

- A system for staff to request assistance
- A system to determine the type and level of support for children and staff within 30 school days from date of request
- Regular communication among program staff, including the Disability Coordinator, assigned Instructional Coach/Education Specialist, Education Service Provider Mental Health Coordinator, Family & Community Support Team, COSA Wellness Support Team, campus administrator, and other applicable team members, to facilitate quality outcomes for children
- A coaching system that includes a cycle of observations, feedback, and goal setting and tools used to document the cycle

Requests for assistance, behavior consultations, and behavior coaching must be documented in ChildPlus according to the *City of San Antonio Benchmark Due Date Guide* and applicable *ChildPlus Data Entry Guide*.

Performance Standard:

1302.92

	DHS Head Start Program Policy		
EnvHS 2			
SUBJECT	Staffing and Class Size Requirements		
REFERENCE	Environmental Health and Safety		
EFFECTIVE	3/13/2012		
Policy Council Approval: 4/23/19	Policy Council Revision: 4/23/19	Governing Body Approval: 5/23/19	Governing Body Revision: 5/23/19
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Policy:

All Head Start classrooms must be staffed by two paid staff persons: a teacher and an aide/instructional assistant/paraprofessional or two teachers. The program will maintain appropriate staffing during Head Start program hours except for brief absences of a teaching staff member for no more than five minutes to accommodate for a teacher or child's needs. One teacher or staff member may accompany a small group of children away from the group for a brief period of time, not to exceed a ratio of 1:10, to accommodate for program needs, such as onsite clinics, special events, child restroom breaks, etc.

Head Start Program hours vary by site and are set and approved at the beginning of the program year as part of the Education Service Provider's Program Design.



A class that serves a majority of children who are three years olds, must have no more than 17 children. A class that serves a majority of children who are four and five years old, must have no more than 20 children. Class sizes are determined based on square footage, with a minimum of 35 square feet/child.

The predominant age of the class must be established at the start of each program year and is based on the age of the majority of the children in the classroom. Intact and separate 3 year-old and 4 year-old classes will be established prior to the beginning of the school year, or by September 1st, in order to create a developmentally appropriate learning environment for all children. The establishment of mixed age group classes or changes to the classroom age group designation must be authorized by the Grantee.

A volunteer may be used to maintain the required teacher/student ratio only for short periods of time, 10-15 minutes, to accommodate for unscheduled interruptions/emergencies. A volunteer must never be left alone with children. All volunteers must sign the Head Start Standards of Conduct, pass a background check, and receive volunteer training. Education Service Providers must maintain documentation of volunteer training, background checks, and Standards of Conduct.

Performance Standard(s):

1302.21(b)(1-4); 1302.94(b)

	DHS Head Start Program Policy		
EnvHS 3			
SUBJECT	Hygiene & Cleaning Practices		
REFERENCE	Environmental Health and Safety		
EFFECTIVE	6/15/2011		
Policy Council Approval: 7/28/20	Policy Council Revision: 7/28/20	Governing Body Approval: 8/13/20	Governing Body Revision: 8/13/20
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Policy:

Education Service Providers must develop and implement procedures to promote safe food preparation, appropriate hand washing hygiene and standard precautions, and sanitation and disinfecting of the classroom, including equipment and materials. Staff must be trained on procedures and documentation of training must be maintained.

Education Service Providers will follow guidance from the Office of Head Start (OHS) or recommendations made by the Centers for Disease Control and Prevention, State of Texas, the Texas Education Agency, the City of San Antonio Metro Health Department, and/or Caring for Our Children National Health and Safety Standards Guidelines for Early Care and Education Programs when establishing procedures for hygiene, cleaning, disinfecting, and sanitation practices.

Performance Standard:

1302.47(b)(6) (i-iii)

	DHS, Head Start Program Policy		
EnvHS 10			
SUBJECT	Rest Time Arrangements		
REFERENCE	Environmental Health and Safety		
EFFECTIVE	07/25/2017		
Policy Council Approval: 4/23/19	Policy Council Revision: 4/23/19	Governing Body Approval: 5/23/19	Governing Body Revision: 5/23/19
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Policy:



Education Service Providers will provide the opportunity for children to rest or nap every day. A child is not required to sleep during rest time. Education Service Providers must ensure that quiet learning activities are provided for children who do not want or need to sleep.

All Head Start children are provided an individual mat, cot, or bed that is waterproof or washable. Mats, cots, or beds must be used in accordance with all appropriate Head Start regulations and performance standards, [Centers for Disease Control and Prevention](#), [Texas Education Agency](#), Caring for Our Children: National Health and Safety Performance Standards, and Texas Health and Human Services Commission/Child Care Licensing Minimum Standards for Child Care Centers.

Education Service Providers will develop and implement procedures on individual mat assignments, proper sleep arrangements, storage, and cleaning/sanitizing, so as to prevent the spread of infectious diseases and illnesses.

Performance Standard(s):

1302.21(d)(1), 1302.31(e)(1), 1302.47(a)

	DHS Head Start Program Policy		
PDM 1			
SUBJECT	Program Monitoring		
REFERENCE	Program Design and Management		
EFFECTIVE	5/11/2010		
Policy Council Approval: 4/23/19	Policy Council Revision: 4/23/19	Governing Body Approval: 5/23/19	Governing Body Revision: 5/23/19
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Policy:

The Head Start Program will develop and implement a process of ongoing monitoring and continuous improvement of the service delivery and program operations. The City of San Antonio Head Start (City) and Education Service Providers will abide by all local, state, and federal regulations. The Head Start Program will provide high-quality program services, share strategies, and communicate plans to ensure child and adult safety.

The Head Start Program will use the following monitoring systems:

- Education Service Provider level monitoring system for ongoing monitoring to include regular site visits to all Head Start sites and classrooms
- Site visits to all Head Start centers will be announced and unannounced
- City level monitoring system that ensures Education Service Providers have effective oversight of service delivery systems and remain in compliance with all local, state, and federal regulations
- Utilization of ChildPlus by the City and Education Service Providers to collect and record information about children and families for data analysis, evaluation, and program improvement
- Collaborative review of program information for planning and future development
- Annual Self-Assessment
- Managed by Information (MBI) Reporting
- Content Area Data Reports

City Program Responsibilities:

The City will develop procedures for ongoing monitoring of the Head Start Program. These procedures will provide guidance and expectations of how Education Service Providers will be monitored. These procedures will also include the requirements for reporting findings.

The City will establish a monitoring model that will help ensure timely and effective delivery of services and provide content area expertise and support to the Education Service Providers. The City will focus on direct monitoring, reviewing, and validating the results of Education Service Providers monitoring activities.

The City will monitor required program tasks and responsibilities to ensure completion within required timelines and according to guidelines provided in the Head Start Program Performance Standards, local, state, and federal regulations.

Monitoring of the Head Start Program is a continuous process and all findings are shared with the Head Start Administrator to determine the level of compliance with the Head Start Program Performance Standards, local, state, and federal regulations. The results of ongoing monitoring will be shared with the Head Start Administrator, Leadership Team, Management Team, the governing body and ~~as needed to~~ the Policy Council, ~~to determine the level of compliance with Head Start Program Performance Standards, local, state, and federal regulations.~~

The City will follow up on monitoring issues or concerns to ensure ~~corrective action~~ corrections and implementation of corrective actions plans ~~quality improvement plans~~. The City may provide training, technical assistance, and resources to assist the Education Service Providers in developing and implementing a corrective action and quality improvement plan.

The City will establish an annual monitoring calendar of monitoring activities and will share with the Education Service Providers.

~~The City will conduct the Annual Self Assessment by utilizing program data. The City will share results with stakeholders including parents, Policy Council members, Governing Body members, community members, and program staff. With the participation of stakeholders, Head Start parents, Policy Council members, Governing Body members, community members, and program staff, the City will conduct the Annual Self-Assessment by utilizing program data. The results will be shared with all stakeholders.~~

Education Service Provider Responsibilities:

Education Service Providers are responsible for establishing their own monitoring systems in accordance with Head Start Program Performance Standards and the City of San Antonio Head Start Policies. Education Service Providers are responsible for the following:

- Developing and implementing procedures for ongoing monitoring
- Submitting an annual monitoring calendar to the City
- Taking corrective action
- Requesting assistance from the City when needed
- Reporting the results of monitoring to the City
- Implementing a corrective action plan ~~quality improvement plan~~ that prevents reoccurrence of previous findings

Education Service Providers will develop and implement a procedure to monitor and report results in the following areas:

- Education Services
- ERSEA
- Health/Dental Services
- Nutrition
- Disabilities
- Mental Wellness Support Services
- Family & Community Support Services
- Transportation
- Environmental Health and Safety
- Human Resources

Education Service Providers will utilize their internal monitoring systems, to include ChildPlus, to document all results. Upon request by the City, all monitoring documents must be made available within reasonable time.

Education Service Provider Corrective Action:



Following the receipt of results from a monitoring project completed by the City, the Education Service Providers will:

- Complete all Corrective Action Plans (CAPs) in ChildPlus based on set deadlines established by the City
- Address any finding related to child health and safety that is an immediate threat within 24 hours
- Develop quality improvement plans as requested by the City

The Education Service Provider may request an extension prior to the initial deadline along with justification if they are unable to meet the deadline for the completion of a CAP. The Special Projects Manager over City Monitoring or Head Start Administrator may give permission and/or add provisions related to the CAPs and approve as needed.

Performance Standard(s):

Subpart J- Program Management and Quality Improvement
1302.100 – 1302.103 (a-b)

	DHS, Head Start Program Policy		
PDM 15			
SUBJECT	Staff Health Requirements		
REFERENCE	Program Design and Management		
EFFECTIVE	6/15/2011		
Policy Council Approval: 4/24/18	Policy Council Revision: 4/24/18	Governing Body Approval: 8/17/18	Governing Body Revision: 8/17/18
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Policy:

The Head Start Program will develop and implement procedures requiring identified program staff to submit a copy of their most recent physical exam or approved health document within 30 business days of hire to ensure that staff do not pose a significant risk to the health or safety of others in the program. The annual/physical exam or approved health document must not be more than 12 months old and must include appropriate screenings or tests for Tuberculosis or other communicable diseases as recommended by a healthcare professional.



Every five years after the initial hire date, staff must submit a copy of their most recent physical exam or approved health document. The physical exam or approved health document must not be more than 12 months old and must include appropriate screenings or tests for Tuberculosis or other communicable diseases as recommended by a healthcare professional.

The Head Start Program, including the Grantee and Education Service Providers, will develop and implement procedures to ensure regular volunteers complete appropriate screenings or tests for Tuberculosis or other communicable diseases as recommended by a healthcare professional.

Documentation of health exams, screenings, and/or tests must be kept on file.

Performance Standard(s):

1302.93; 1302.94

	DHS, Head Start Program Policy		
PDM 18			
SUBJECT	Program Data - Access and Security		
REFERENCE	Program Design and Management		
EFFECTIVE	April 23, 2018		
Policy Council Approval: 1/22/19	Policy Council Revision: 1/22/19	Governing Body Approval: 2/28/19	Governing Body Revision: 2/28/19
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Policy:

The Head Start Program, including Grantee and Education Service Provider, must establish an internal procedure for proper access and security of program data for the City of San Antonio Department of Human Services Head Start and Early Head ~~Start-Child-Care-Partnership (EHS-CCP)~~ Program (DHS Head Start).

Procedure:

DHS Head Start utilizes ChildPlus as the secure database system for storing and tracking client information.

All user account holders are required to complete ChildPlus Access Request and ChildPlus User Security and Confidentiality Agreement forms. Upon completion, the forms are scanned and attached by the ChildPlus Administrator in ChildPlus under each respective user profile.

By accessing the database, staff understands and agrees to abide by all terms of the ChildPlus User Security and Confidentiality Agreement and any applicable state and federal laws regarding Personally Identifiable Information (PII) and Protected Health Information (PHI).

- Education Service Providers are required to designate a staff member to complete the Personnel Profile for all staff members funded by the Head Start or EHS-CCP grant or anyone who works with children or families enrolled in the Head Start or EHS-CCP programs under the Management Module in ChildPlus. Designated staff is defined as preauthorized users in the Management/Personnel Module.
- Upon completion of the Personnel Profile, the designee will notify the ChildPlus Administrator if the user requires access to PII. Not all personnel require a ChildPlus user account.
- The ChildPlus Administrator will confirm with the designee the role of personnel and the types of access required.

- The ChildPlus Administrator will complete a User Security profile in ChildPlus, assign a login username and temporary password, restrict access by location, and designate User Security group(s).
- The ChildPlus Administrator will email the new account holder the login username and temporary password.
- The new account holder will log into ChildPlus and change the temporary password to a permanent password.

Authorized ChildPlus users are granted access under one of the following groupings:

- Staff: A ChildPlus personnel account will be created for all staff. ChildPlus user accounts and access is granted upon the approval of the ChildPlus Access Request Form and the completion of the ChildPlus User Security and Confidentiality Agreement Form.
- Education Service Providers: An assigned ChildPlus Super User for each Service Provider formally requests accounts via email for Service Provider Head Start Staff. Service providers are subject to the confidentiality provisions under the Family Educational Rights and Privacy Act (FERPA).
- Contracted Providers: A Special Projects Manager or designee will request user accounts for contractual providers via email or meeting with the ChildPlus Administrator. To meet the requirements of HIPAA, DHS Head Start requires any contract that include access to client information include an enforceable Business Associate Agreement (BAA). BAAs are documented in the professional services contract with the DHS Head Start.

Implementation of technical policies and procedures for electronic information systems that maintain electronic PII, PHI, and IDEA ~~P~~art B and C to allow access only to those persons or software programs that have been granted access rights.

All DHS Head Start staff, regardless of position, share the responsibility to safeguard HIPAA, FERPA, PHI, PII, and the Individuals with Disabilities Education Act (IDEA) ~~p~~Part B and C data from unauthorized access, acquisition or disclosure. Staff that share PHI, PII and IDEA ~~P~~art B and C electronically must ensure the receiving entity is an authorized recipient of the specific data being delivered.

Only computers configured by ITSD for use on the CoSA network are authorized for accessing ChildPlus.

Staff may utilize a ~~laptop program issued computer or device and a secure means such as VPN, Workspace or Citrix~~ to access ChildPlus.

Staff ensures the environment in which they are working is secure and only authorized persons are within viewing distance of the authorized user's screen.

Disclosure ChildPlus information to a contractor is authorized but ONLY when an enforceable

Business Associate Agreement (BAA) is in place.

All DHS Head Start staff must successfully complete the following trainings: ~~annually:~~



- ~~CoSA HIPAA 101 Privacy online training module~~
- ~~CoSA HIPAA 102 Security online training module~~
- ~~CoSA Employee Security Awareness Day in the Life online training module~~
- [CoSA Monthly Security Awareness Training](#)
- [CoSA Monthly HIPPA Training](#)
- Completion of these trainings are documented and maintained by the City of San Antonio Human Resources Department.

All DHS Head Start staff must successfully review and acknowledge review and acceptance of CoSA Administrative Directives that include Data Security and Use of Technology.

Education Service Providers and contractors must develop and implement procedures to ensure all staff comply with this procedure and ensure all staff receive training on safeguarding FERPA, HIPAA, PHI, PII and (IDEA) ~~P~~art B and C data.

Performance Standard:

1302.101(b)(4)

	DHS, Head Start Program Policy		
PDM 19			
SUBJECT	Management of Program Data		
REFERENCE	Program Design and Management		
EFFECTIVE	April 23, 2018		
Policy Council Approval: 1/22/19	Policy Council Revision: 1/22/19	Governing Body Approval: 2/28/19	Governing Body Revision: 2/28/19
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Policy:

The Head Start Program, including the Grantee and Education Service Providers, must establish an internal procedure for proper management of program data for the City of San Antonio Department of Human Services Head Start and Early Head Start ~~–Child Care Partnership (EHS-CCP)–~~ Program (DHS Head Start).

Procedure:

Implementation of technical policies and procedures for electronic information systems that maintain electronic PII, PHI, and IDEA ~~part B~~ Part B and C to allow access only to those persons or software programs that have been granted access rights.

All DHS Head Start staff, regardless of position, share the responsibility to safeguard FERPA, HIPAA, PHI, PII, and the Individuals with Disabilities Education Act (IDEA) ~~part B~~ Part B and C data from unauthorized access, acquisition, or disclosure. Staff that share PHI, PII and IDEA ~~part B~~ Part B and C electronically must ensure the receiving entity is an authorized recipient of the specific data being delivered.

- Only computers configured by ITSD for use on the CoSA network are authorized for the storage or transport of PHI, PII and/or IDEA ~~part B~~ Part B and C data.
- Staff may utilize a program issued device ~~laptop and a secure means such as VPN, Workspace or Citrix~~ to access systems to view and maintain PHI, PII, and IDEA ~~part B~~ Part B and C files.
- Staff ensures the environment in which they are working is secure and only authorized persons are within viewing distance of the authorized user's screen.
- Disclosure of PII and/or PHI, and/or IDEA ~~part B~~ Part B and C to a contractor is authorized but ONLY when an enforceable Business Associate Agreement (BAA) is in place.
- Personal devices shall not be used to store or transmit unencrypted protected data.
- Any removable media or storage devices used to transfer PHI, PII, and/or IDEA ~~part B~~ Part B and C data must be encrypted.

- If any PHI, PII, and/or IDEA ~~part B~~Part B and C data is transmitted via email attachment, the attachment must be protected by a password. The password to access the attachment must be sent to the recipient in a separate email.
- Hard copies (i.e., paper) of any PHI, PII, and/or IDEA ~~part B~~Part B and C data must be kept secured in a lockable file cabinet or other secured storage.
- In the event that PHI, PII, and/or IDEA ~~part B~~Part B and C data, either hard copy or electronic, are transported between locations, staff must take all precautions to ensure the materials remain secure and must remain in the presence of staff at all times.

Facsimiles

- Any documents received via facsimile, either telefax or online, that contain PHI, PII and/or IDEA ~~part B~~Part B and C data shall be uploaded or scanned into appropriate software (i.e., ChildPlus) as soon as possible. Any electronic copies of the facsimile should be saved to the user's desktop; once the upload is completed the file should be deleted and the deletion confirmed. Any hardcopies of the facsimile must be stored in a secure location or destroyed.
- Any hardcopies of the documents sent via facsimile, either telefax or online, that contain PHI, PII and/or IDEA ~~part B~~Part B and C data shall be either stored in a secure location or destroyed.

All DHS Head Start staff must successfully complete the following trainings annually:

- ~~CoSA HIPAA 101 Privacy online training module~~
- ~~CoSA HIPAA 102 Security online training module~~
- [CoSA Monthly Security Awareness Training](#)
- [CoSA Monthly HIPPA Training](#)
- CoSA Employee Security Awareness Day in the Life online training module

Completion of these trainings are documented and maintained by the City of San Antonio Human Resources Department.


All DHS Head Start staff must successfully review and acknowledge review and acceptance of CoSA Administrative Directives that include Data Security and Use of Technology.



Education Service Providers and contractors must develop and implement procedures to ensure all staff comply with this procedure and receive training on safeguarding FERPA, HIPAA, PHI, PII and IDEA ~~part B~~Part B and C data.

Performance Standard:

1302.101(b)(4)

EARLY HEAD START

 2021-2022 Early Head Start Policy Index		Change Required?	Description and Volume of Change made to current Policy
Disabilities			
1	Individualized Family Service Plan (IFSP) for Children with Delays/ Disabilities	Yes	Language change to include home based program
Education and Early Childhood Development			
5	Development and Behavioral Screening	Yes	Language change to include home based program and home visitor. Removed CCP
8	Child File	Yes	Changed name of policy- removed classroom from title. Added language to include home based program and home visitor. Removed CCP
9	Multidisciplinary Staffing	Yes	Language Change to include home visitor. Removed CCP
12	Classroom Observations	Yes	Minor Language Change fo Child Care Regulation. Removed CCP
17	Coaching	Yes	Minor Language Change to inclde Instructional Coach. Removed CCP
Environmental Health and Safety			
3	Hygiene Practices	Yes	Removed CCP. Added updates related to guidance
4	Management of Illness/ Conditions of Short Term Exclusions and Admittance	Yes	Removed CCP. Added updated related to guidance
Program Design and Management (PDM)			
1	Program Monitoring	Yes	Added Senior Special Projects Manager - Early Head Start and removed CCP
7	Identification and Reporting of Child Abuse and Neglect	Yes	Added - including Early Head Start. Removed - CCP. Added New Senior SPM position
8	Community Complaints	Yes	Added - including Early Head Start. Removed - CCP. Added New Senior SPM position
9	Critical Incident Reporting	Yes	Added - including Early Head Start. Removed - CCP. Added New Senior SPM position
18	Program Data- Access and Security	Yes	Added - including Early Head Start. Removed - CCP. Updated training list to align with CoSA practices
19	Management of Program Data	Yes	Added - including Early Head Start. Removed - CCP. Updated training list to align with CoSA practices

	DHS Early Head Start Program Policy		
DISABILITIES 1			
SUBJECT	Individualized Family Service Plan (IFSP) for Children with Delays/ Disabilities		
REFERENCE	Disabilities Services		
EFFECTIVE	10/01/2020		
Policy Council Approval: 9/22/20	Policy Council Revision: 9/22/20	Governing Body Approval: 11/12/20	Governing Body Revision: 11/12/20
PAGE: 1 of 1			

Policy:

The Individualization policy guidelines in Education and Early Child Development Policy and the information provided in the child's IFSP will be used when planning individualized strategies and activities for children with delays/disabilities. Every effort must be made to include children with delays/disabilities in all program activities.



Early Head Start (EHS), Service Providers and City staff will coordinate to receive and review the IFSP as soon as possible after the Initial Assessment or Assessment meetings. If a child enters the EHS Program with a current IFSP, City staff will coordinate with Service Providers to review the IFSP within two weeks of a child's first day of attendance or first home visit.

Service Providers must initiate the implementation of the IFSP immediately after the review by modifying the child's daily activities in accordance with the IFSP and arranging for the provision of related services to accommodate the unique strengths, needs, interests, learning style, and cultural and linguistic background of the child.

Copies of the IFSP will be maintained in the Child File. Confidentiality of information will be maintained at all times. Individual child disability information and copies of additional required documents will be entered into Child Plus according to the City of San Antonio Benchmark Due Date Guide and the EHS- Child File Scan Order and Attachment Guide.

Performance Standard(s):

1302.61; 1302.62; 1302.63; 1303.75

	DHS, Early Head Start Program Policy		
EDUCATION 5			
SUBJECT	Development and Behavior Screening		
REFERENCE	Education and Early Childhood Development		
EFFECTIVE	8/1/19		
Policy Council Approval: 9/22/20	Policy Council Revision: 9/22/20	Governing Body Approval: 11/12/20	Governing Body Revision: 11/12/20
PAGE: 1 of 2			

Policy:

The Early Head Start Program uses the Ages and Stages Questionnaire (ASQ-3) as the developmental screening and the Ages and Stages Questionnaire Social and Emotional, Second Edition (ASQ: SE-2) as the behavioral screening.

Service Providers must complete the ASQ 3 and ASQ: SE-2 in collaboration with each child's parent/guardian on or before the 45th calendar day after the child first attends the program. Returning children will not be rescreened each program year. Developmental and behavioral screenings must be completed within the timeframe to identify early concerns regarding a child's developmental, sensory, behavioral, motor, language, social, cognitive, perceptual and emotional skills so appropriate referrals are made.

The ASQ-3 and ASQ: SE-2 will not be completed by the teacher or home visitor. If the parent or guardian needs assistance completing the questionnaire, the teacher, home visitor or other staff member may provide the most appropriate accommodation for completion. The ASQ-3 and ASQ: SE-2 will be distributed by the Service Provider no more than two weeks prior to the first day of a child's entry into the center for center-based services. For home-based services the ASQ-3 and ASQ:SE-2 will be distributed no more than two weeks prior to the first home visit. The screenings may not be distributed during Early Head Start (EHS) enrollment, or family meetings. To the greatest extent possible, the screening procedures must be sensitive to the child's cultural background and home language.

EHS Program and Service Providers will work together to develop a comprehensive system to ensure proper training, administration and monitoring of the screening tools that includes, at a minimum, the following:



- Identifying appropriate staff responsible for administering, scoring, and follow-up and referrals.
- Ensuring the appropriate version is utilized for child's age and language.

- Ensuring proper completion of the screening tool.
- Ensuring accurate scoring of the screening tool.
- Establishing timeframes for follow-ups, referrals, and documentation
- Following the *City of the San Antonio Benchmark and Due Date Guide* and the *EHS File Scan Order and Process Guide*.
- Completing routine internal monitoring of child files.
- Monitoring the fidelity of screenings

EHS Program will develop and implement procedures to address the use of the ASQ-3 and ASQ: SE-2 with children with an identified disability or Individual Family Service Plan (IFSP). A child is not automatically disqualified from receiving a developmental or behavioral screening if they have an identified disability or IFSP. Sensitivity to the parent/guardian should always be a priority. Procedures may include a determination to complete only certain sections of the ASQ-3 or the ASQ: SE-2. If it is determined by the teacher, home visitor, or other early childhood professional that it is not appropriate for a parent/guardian to complete any section of the developmental or behavioral screening, the information supporting this determination must be documented in Child Plus according to the *ChildPlus Data Entry Guide*.

Performance Standard:

1302.33;1302.25

	DHS, Early Head Start Program Policy		
EDUCATION 8			
SUBJECT	Child File		
REFERENCE	Education and Early Childhood Development		
EFFECTIVE	10/1/2020		
Policy Council Approval: 9/22/20	Policy Council Revision: 9/22/20	Governing Body Approval: 11/12/20	Governing Body Revision: 11/12/20
PAGE: 1 of 1			

Policy:

The Early Head Start (EHS) Program and Service Providers will work together to develop a system to ensure that each child has a Child File that organizes and contains multiple sources of information used for ongoing assessments and instructional planning.



The Child File for center-based services will contain the following:

- Documentation from home visits and parent conferences including parent/guardian input
- Work samples
- Developmental Screening
- Social and Emotional Screening
- Beginning, Middle and End of year formal assessment summary information
- Transition activities (if applicable)
- IFSP, if applicable
- Other items pertaining to educational development
- The Child File for home-based services will contain the following: Work samples
- Developmental Screening
- Social and Emotional Screening
- Beginning, Middle and End of year formal assessment summary information
- Transition activities (if applicable)
- IFSP, if applicable
- Other items pertaining to educational development

The Service Providers must develop a system to ensure that the Child File is located in the teacher's classroom or home visitor's office, kept confidential, and available for parents to review upon request with the teacher or home visitor. The file must also be accessible to parents/guardians and monitors/reviewers upon request.

Performance Standard(s):

1302.30-1302.34;1302.35

	DHS, Early Head Start-Child Care Partnership Program Policy		
EDUCATION 9			
SUBJECT	Multidisciplinary Staffing		
REFERENCE	Education and Early Childhood Development		
EFFECTIVE	10/1/20		
Policy Council Approval:	Policy Council Revision:	Governing Body Approval:	Governing Body Revision:
PAGE: 1 of 1			

Policy:



The Early Head (EHS) Program and Service Providers will work together to develop a system in place for regular communication among program staff to facilitate quality outcomes for children and families. Service Providers will schedule at least two Multidisciplinary Staffing (MDS) meetings annually for every enrolled child. If a child enters the program after January 31st, a minimum of one MDS meeting will be held before the last day of the program year.

The MDS meeting is a documented and planned communication tool utilized to create a cohesive team approach to discuss the strengths and needs of children and families. The Center Director or designee, Family Support Staff, and Teachers or Home Visitor, are required to participate in the MDS. Content area coordinators responsible for Education, Health, ERSEA, Mental Health, Transportation, Nutrition, Disabilities and other related services may be required to attend based on the child/family needs.

The EHS Program and Service Providers will work to develop and maintain a record-keeping system to provide accurate and timely information regarding children, families, and staff and must ensure appropriate confidentiality of this information. The MDS documentation must include the completion date of the MDS, signatures of all in attendance, and topics covered. A system must be in place to ensure that completion dates of the MDS are entered and the MDS document is scanned into Child Plus and meets the *City of the San Antonio Benchmark Due Date Guide*, applicable *ChildPlus Data Entry Guide*, and the *Early Head Start File Scan Order and Process Guide*.

Performance Standard(s):

1302.101(b)(2)(3); 1302.33; 1302.34; 1302.35

	DHS, Early Head Start Program Policy		
EDUCATION 12			
SUBJECT	Classroom Observations		
REFERENCE	Education and Early Childhood Development		
EFFECTIVE	10/1/2020		
Policy Council Approval: 9/22/20	Policy Council Revision: 9/22/20	Governing Body Approval: 11/12/20	Governing Body Revision: 11/12/20
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Policy:

The Early Head Start (EHS) Program, City Staff and Service Providers will work together to develop and implement a system for conducting monthly classroom observations for center-based services. Service Providers will review (at a minimum) the following areas throughout the program year:



- Indoor classroom environment
- Outdoor classroom environment
- Health & Safety
- Curriculum / lesson plans / daily schedule
- Teacher / child interactions and relationships
- Nutrition
- Individualization
- Family Engagement

All areas listed above must be reviewed at least once every six months (Aug-Jan and Feb- July) in each classroom. Service Providers must also ensure that all classrooms are in compliance with Head Start, City of San Antonio, and Texas Health and Human Services Child Care Regulation Minimum Standards, policies, and guidance.

Classroom observation documentation will be shared and used to guide professional development.

Performance Standards:

1302.31;1302.35

	DHS Early Head Start Program Policy		
EDUCATION 17			
SUBJECT	Coaching		
REFERENCE	Education and Early Childhood Development		
EFFECTIVE	10/1/2020		
Policy Council Approval: 9/22/20	Policy Council Revision: 9/22/20	Governing Body Approval: 11/12/20	Governing Body Revision: 11/12/20
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Policy:

The Early Head Start (EHS) Program and Service Providers will implement a researched-based coordinated coaching strategy for education staff. EHS staff and Service Providers will develop and implement procedures to identify strengths, areas of needed support, and which staff would benefit most from coaching.

Service providers must collaborate with the EHS Program to designate a qualified staff member who has the knowledge, skills and abilities to serve as a Peer/Instructional Coach. The Peer/Instructional Coach will provide ongoing coaching and support to teachers and home visitors to strengthen their skills and help increase the quality of care and child outcomes.

Ongoing Coaching will include reviewing the following areas for center-based teachers:

- Indoor classroom environment
- Outdoor environment
- Health & Safety
- Curriculum Implementation and Fidelity
- Lesson plans and daily schedules
- Teacher/child interactions
- Family engagement



Ongoing Coaching will include reviewing the following areas for home visitors:

- Promoting the role of the parent as the child's teacher through experiences focused on the parent-child relationship
- Health & Safety
- Curriculum Implementation and Fidelity
- Lesson Plans
- Family Engagement

All coaching consultations will be documented.

Performance Standard

1302.92(c);1302.35

	DHS Early Head Start Program Policy		
ENVIRONMENTAL HEALTH AND SAFETY 3			
SUBJECT	Hygiene & Cleaning Practices		
REFERENCE	Environmental Health and Safety		
EFFECTIVE	8/1/2016		
Policy Council Approval: 7/28/20	Policy Council Revision: 7/28/20	Governing Body Approval: 8/13/20	Governing Body Revision: 8/13/20
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Policy:

Early Head Start (EHS) Program Service Providers will develop and implement systems that promote hand washing, hygiene and sanitation and disinfecting of the classroom including equipment and materials. Providers must ensure staff is trained on the procedures and documentation of training must be maintained.

Service Providers will follow guidance from the Office of Head Start (OHS) or recommendations made by the Centers for Disease Control and Prevention, Child Care Regulation, the City of San Antonio Metro Health Department, and/or Caring for Our Children National Health and Safety Standards Guidelines for Early Care and Education Programs when establishing procedures for hygiene, cleaning, disinfecting, and sanitation practices.

Hand washing

- Staff, volunteers, and children must wash their hands with soap and running water at a minimum during the following times:
 - Upon arrival,
 - Before and after diapering or toilet use
 - Before food preparation, handling, or any other food-related activity
 - Before and after eating
 - Whenever hands are contaminated with blood or other bodily fluids
 - After handling pets or other animals
 - After outdoor activities
 - Before and after playing in a water/sand play table
 - Any other time there is reason to believe the child has come in contact with substances that could be harmful to the child

- Staff and volunteers must also wash their hands with soap and running water:
 - Before and after giving medication
 - Treating or bandaging a wound
 - After assisting a child with toilet use
 - After using any cleaners or toxic chemicals; and
 - After removing gloves

Hygiene



- Easily accessible nonporous, on-latex, disposable gloves are to be worn by all staff when they are in contact with blood or bodily fluids.
- Bodily fluids should be cleaned and disinfected immediately in keeping with Head Start Performance Standards and Texas Health and Human Services Commission/Child Care Licensing Minimum Standards.
- Any tools and equipment used to clean bodily fluids should be cleaned, disinfected immediately, and blood-contaminated materials must be disposed of properly.
- Hand Sanitizers, pre-moistened towelettes, and waterless hand cleaners are not allowed to replace hand-washing and should not be accessible or used on children.

Sanitation

- Toys and equipment that are placed in a child's mouth, or otherwise contaminated by body secretion or excrement, must be sanitized before handling by another child
- Cloth toys must be washed at least weekly and when contaminated
- All linens must be washed at least weekly and when soiled or before another child uses them
- All sleeping equipment must be sanitized before a different child uses it and when soiled
- Water play tables must be empty, and toys used in water tables must be sanitized daily, children and caregivers must wash their hands before using the water table
- Sand boxes and tables must be maintained in a sanitary manner
- All garbage must be inaccessible to children and managed to keep the child-care center inside and outside, free of insects, rodents, and offensive odors and disposing of it according to local and state requirements
- All floors, ceilings and walls must be kept in good repair and clean. Paint used at the center must be lead-free
- All areas in the center used by children will be kept heated, lighted and ventilated
- All tabletops, furniture and other similar equipment used by children when soiled or contaminated with matter such as food, body secretions or excrement will be sanitized
- All cleaning supplies and other toxic materials will be marked and kept separate from food and inaccessible to children
- Hazardous materials will be stored and disposed of as recommended by the manufacturer

Performance Standard:

1302.47(b)(6)(i)(ii)(iii)

	DHS Early Head Start Program Policy		
ENVIRONMENTAL HEALTH AND SAFETY 4			
SUBJECT	Management of Illness / Conditions of Short-Term Exclusions and Admittance		
REFERENCE	Environmental Health and Safety		
EFFECTIVE	8/1/2016		
Policy Council Approval: 7/28/20	Policy Council Revision: 7/28/20	Governing Body Approval: 8/13/20	Governing Body Revision: 8/13/20
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Policy:

Early Head Start (EHS) Service Providers will develop and implement procedures for children and staff who are ill. Procedures should include:

- Practices to control an infectious disease outbreak
- Notification of any reportable illnesses to include local or state public health agencies
- Training on accommodations that must be made for children with specific health and safety needs
- Practices to ensure confidentiality of children's health and safety needs
- Exclusion criteria

A child cannot be denied enrollment based on a disability, illness or chronic health condition or its severity.

Early Head Start (EHS) Program Service Providers may temporarily exclude a child with an acute injury or illness from program participation for a short-term period when the child's needs cannot be readily accommodated or if they pose a significant risk to the health and safety to themselves or anyone that may come in contact with them.

Providers will create and implement procedures to ensure that appropriate staff is informed and trained on any accommodations that must be made for children with specific health and safety needs. Information about any child's health or safety needs should be kept confidential.



Providers will follow guidance from the Office of Head Start (OHS) or recommendations made by the Centers for Disease Control and Prevention, Child Care Regulation, the City of San Antonio Metro Health Department, and/or Caring for Our Children National Health and Safety Standards Guidelines for Early Care and Education Programs when establishing procedures.

Performance Standard:

1302.47 (b)(7)(iii)

References:

Texas Department of State Health Services Communicable Disease Chart for Schools and Child-Care Centers

	DHS, Early Head Start Program Policy		
PDM 1			
SUBJECT	Program Monitoring		
REFERENCE	Program Design and Management		
EFFECTIVE	8/1/2016		
Policy Council Approval: 4/23/19	Policy Council Revision: 4/23/19	Governing Body Approval: 5/23/19	Governing Body Revision: 5/23/19
PAGE: 1 of 3			

Policy:

The Early Head Start Program (EHS) will develop and implement a process of ongoing monitoring and continuous improvement of the service delivery and program operations. The program will abide by all local, state, and federal regulations. The EHS will provide high-quality program services, share strategies, and communicate plans to ensure child and adult safety.

The EHS Program will use the following monitoring systems:

- Service Provider level monitoring systems for ongoing monitoring efforts and activities to include regular site visits to all EHS Service Providers and classrooms
- Site visits to all EHS centers will be announced and unannounced
- Service Provider level monitoring through the Texas Health and Human Services Commission/ Child Care Regulation (THHSC)
- Service Provider level monitoring through the Texas Rising Star, Texas Quality Rating and Improvement System applicable to the EHS-CCP providers only
- City level monitoring system that ensures Service Providers have effective oversight of service delivery systems and remain in compliance with all local, state, and federal regulations
- Periodic collecting and reporting of program data to the City, by Service Providers
- Utilization of Child Plus by the City and the Service Providers to collect and record information about children and families for data analysis, evaluation and program improvement
- Collaborative review of program information for planning and future development
- Annual Self-Assessment
- Managed by Information (MBI) Reporting
- Content Area Data Reports

The EHS Program's Responsibilities:

EHS will develop procedures for ongoing monitoring of the program. These procedures will provide guidance and expectations of how the EHS program will monitor internally and externally. These procedures will also include the requirements for reporting findings.

EHS will establish a monitoring model that will help ensure timely and effective delivery of services and provide content area expertise and support to the EHS Service Providers. EHS will focus on direct monitoring, reviewing, and analyzing the results of Service Providers.

EHS will monitor required program tasks and responsibilities to ensure completion within required timelines and according to guidelines provided in the Head Start Program Performance Standards, federal and state regulations, and local laws and rules.

Monitoring of the EHS Program is a continuous process and all findings are shared with the EHS Senior Special Projects Manager, when needed with the Head Start Administrator, to determine the level of compliance with the Head Start Program Performance Standards, local, state, and federal regulations. The results of ongoing monitoring will be shared with the Head Start Administrator, Leadership Team, Management Team, the Governing Body and Policy Council.

The EHS Program will follow-up on monitoring issues or concerns to ensure corrections and implementation of corrective action plans. EHS- may provide training and technical assistance and resources to assist the Service Providers in developing and implementing a corrective action and quality improvement plan.

The EHS program will establish an annual monitoring calendar of monitoring activities and will share with the Service Providers.

With the participation of stakeholders, Head Start parents, Policy Council members, Governing Body members, community members, and program staff, the City will conduct the Annual Self-Assessment by utilizing program data. The results will be shared with all stakeholders.

Service Provider Responsibilities:

Service Providers are responsible for the following:

- Allowing access to EHS program monitor for scheduled and unscheduled visits
- Taking corrective action
- Requesting assistance from when needed
- Reporting any results pertinent to the operations of the Service Provider
- Implementing a corrective action plan that prevents reoccurrence of previous findings

Monitoring Approach:**Three-Tiered Approach for EHS-CCP providers**

Ongoing monitoring for the EHS Program is a three-tiered approach.

- First - Monitoring is completed by the THHSC for all Service Providers.
- Second -The EHS- Program provides monitoring to ensure understanding and compliance with the Head Start Performance Standards and expectations.

- Third –
 - For EHS-CCP providers - The State of Texas Rising Star (TRS) system recognized as the Quality Rating Improvement System for the state of Texas. Upon request by the EHS Program, all monitoring documents must be made available within reasonable time.
 - For EHS provider – Service provider will utilize their defined internal monitoring system. Upon request by the EHS Program, all monitoring documents must be made available within reasonable time.

Ongoing monitoring continues to provide recommendations to enhance the quality of care and services to children and to provide safe and healthy environments through the following service areas:

- Environmental Health and Safety
- Education Services
- Health /Dental Services
- Nutrition
- Disabilities
- Wellness Support Services
- Family & Community Support
- ERSEA
- Human Resources
- Transportation

The EHS Program will utilize the results of monitoring efforts and activities to further evaluate compliance with Head Start Performance Standards and regulations. Service Providers will utilize their appropriate internal monitoring systems, to include Child Plus when applicable, to document all results. Upon request by the City, all monitoring documents must be made available within reasonable time.

Service Provider Corrective Action:



Following the receipt of results from a monitoring project completed by the City, the Service Providers will:

- Complete all Correction Action Plans (CAPs) in Child Plus within 15 business days
- Address any findings related to child health and safety that is an immediate threat to children within 24 hours
- Develop and respond to corrective action plans as requested by the City

The Service Provider or service area manager may request an extension prior to the initial deadline along with justification if they are unable to meet the deadline for the completion of a CAP. Based on the justification, the extension may or may not be granted. The Senior Special Projects Manager over the EHS Program or Head Start Administrator may give permission and/or add provisions related to the CAPs and approve as needed.

Performance Standard(s):

Subpart J-Program Management and Quality Improvement
1302.100 – 1302.103 (a-b)

	DHS Early Head Start Program Policy		
PDM 7			
SUBJECT	Identification and Reporting of Child Abuse and Neglect		
REFERENCE	Program Design and Management		
EFFECTIVE	8/1/2016		
Policy Council Approval: 7/28/20	Policy Council Revision: 7/28/20	Governing Body Approval: 8/13/20	Governing Body Revision: 8/13/20
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Policy:

The Head Start Program, including Early Head Start (EHS) must develop and implement procedures to respond to suspected or known child abuse whether it occurs at or away from the program.

All Head Start staff including Service Provider staff, as well as teachers, teacher assistants, floaters, substitutes, a site personnel, and consultants and volunteers must follow the Service Provider's policies and procedures regarding child abuse and neglect.

The EHS Senior Special Projects Manager must be notified within 24 hours of an incident that has occurred within the EHS Program. The Head Start Administrator must also be notified of any report that has been made for suspected child abuse or neglect occurring away from the EHS within 24 hours of notification. Such official incident reporting must be provided in writing.

Additionally, when any Head Start Program Staff, contractors, Service Providers, Child Care Center staff or Volunteers witness or suspect child abuse or neglect they must make a report to the Texas Department of Family and Protective Services (TDFPS) within 48 hours. According to the State of Texas, Title 5, Chapter 261 of the Family Code, "child abuse is an act or omission that endangers or impairs a child's physical, mental or emotional health and development." Child abuse may take several forms including, but not limited to:

- Physical, mental or emotional injury
- Sexual abuse
- Sexual exploitation
- Physical neglect
- Medical neglect
- Inadequate supervision

In filing a report, personnel will follow state regulations regarding the timeframes that reports must be made, the information that must be reported, and confidentiality of reported information.

Service Providers will develop and implement procedures to notify the parents/guardians of any suspected or known child abuse incidents occurring within the EHS Program. EHS City staff and Service Providers must also comply with Texas Health and Human Services Commission/Child Care Licensing Minimum Standards.

Should the Service Provider be informed that a report has been made for suspected child abuse or neglect occurring outside the Head Start Program, they must comply with notification requirements outlined in this policy.

All EHS staff, including teachers, teacher assistants, and all other campus or site personnel, consultants and volunteers receive training on procedures for identifying and reporting child abuse or neglect. EHS staff are expected to fully cooperate with Texas Department of Family Protective Services, Texas Health and Human Services Child Care Licensing and other applicable agency personnel to report any suspected or known incidents.



Performance Standard(s):

1302.41; 1302.47(5)(i); 1302.90; 1302.92(b)(2); 1302.102
1302.47(b)(4)(i)(K); 1302.47(b)(5)(i); 1302.53(a)(2)(iii); 1302.90(b)(2); 1302.92(b)(2)
1302.102(d)(1)(ii)(A); 1303.22(c)(5)(iii); 1303.22(c)(8)

Resources:

Office of the Texas Attorney General, "What Can We Do about Child Abuse Part 2":
https://www.texasattorneygeneral.gov/ag_publications/txts/childabuse2.shtml

Family Code, Chapter 261. Investigation of Report of Child Abuse or Neglect
<http://www.statutes.legis.state.tx.us/Docs/FA/htm/FA.261.htm>

	DHS Early Head Start Program Policy		
PDM 8			
SUBJECT	Community Complaints		
REFERENCE	Program Design and Management		
EFFECTIVE	8/1/2016		
Policy Council Approval: 7/28/20	Policy Council Revision: 7/28/20	Governing Body Approval: 8/13/20	Governing Body Revision: 8/13/20
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Policy:



The Head Start Program, including Early Head Start, encourages a climate of open communication between parents, program employees, and community members. Head Start and Education Service Provider staff are available to provide support and to assist any parent or community resident who has a complaint, problem or concern.

Parents/guardians and community residents are encouraged to attempt to resolve Head Start complaints, problems or concerns at the center/school level by talking to a teacher, Family Support Worker, center director or principal. Parent/Guardians may at any time also talk directly to any Head Start staff member or Head Start Administrator about any issues or concern. Concerns/complaints may also be submitted using the comment section of the Head Start website at www.saheadstart.org.

If attempts to informally resolve the concern/problem are not successful, the following formal steps may be taken:

1. Call, email, meet with, or provide a written statement to the Head Start Education Service Provider Director. The Director will provide the parent/guardian or community resident a recommendation for resolution of the concern/problem within five business days of receipt of the issue. The Director may request additional time if required to resolve the concern/problem. If not resolved, parents/guardians or community resident may proceed to Step 2.
2. Call, email, meet with, or provide a written statement to the City of San Antonio Head Start Program Administrator. The Head Start Administrator will have five business days to resolve the concern/problem. The Head Start Administrator may request additional time to resolve the concern/problem. If not resolved, parents/guardians or community resident may proceed to Step 3.

3. Submit a signed, written statement to the City of San Antonio City Council's Governing Board/Advisory Committee. The statement shall describe in detail the complaint, problem or concern and steps taken to resolve the issue. The City of San Antonio City Council's Governing Board/Advisory Committee will provide a written response within 15 business days of receipt of the written statement. The City of San Antonio City Council's Governing Board is the last formal step in resolving parent/community resident complaints or concerns and the resolution is final.

	DHS Early Head Start Program Policy		
PDM 9			
SUBJECT	Critical Incident Reporting		
REFERENCE	Program Design and Management		
EFFECTIVE	8/1/2016		
Policy Council Approval: 7/28/20	Policy Council Revision: 7/28/20	Governing Body Approval: 8/13/20	Governing Body Revision: 8/13/20
PAGE: 1 of 1			

Policy:

The Head Start Program, including Early Head Start (EHS) must develop and implement a system for Critical Incident Reporting (CIR). All staff must be trained on incident reporting.



A critical incident includes, but is not limited to:

- Suspected child abuse which may or may not have occurred during service hours.
- Allegations of child abuse/neglect against any EHS staff member, volunteer or contractor, injury to a child due to lack of supervision or unacceptable methods of child guidance
- Incidents which may have placed a child, family member or staff in danger, including any incidents in which a child was left unsupervised
- Health incidents and illnesses, which include, but are not limited to:
 - Injuries that require urgent medical attention by a health-care professional
 - Child or staff member leaving by emergency medical transport
 - Contagious diseases that could lead to an outbreak
 - Child receiving outside medical attention at any point in time for an injury sustained during EHS program hours
- Any incident which has the potential to generate negative media coverage
- Any media inquiry/coverage of the program
- Unplanned interruption in EHS Program services
- Closure of any facility or part of a facility, including outdoor play areas
- Accidents involving vehicles that transport children and families

When applicable, parents/guardians must be notified of critical incidents within 24 hours of occurrence. Providers must also provide notification to the EHS Senior Special Projects Manager or designee within 24 hours.

Performance Standard(s):

1302.47(c); 1302.102(d)(1)(ii); 1304.12; 1303.79(b)(3)

	DHS Early Head Start Program Policy		
PDM 18			
SUBJECT	Program Data – Access and Security		
REFERENCE	Program Design and Management		
EFFECTIVE	4/23/18		
Policy Council Approval: 1/22/19	Policy Council Revision: 1/22/19	Governing Body Approval: 2/28/19	Governing Body Revision: 2/28/19
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Policy:

The Head Start Program, including Early Head Start (EHS), must establish an internal procedure for proper access and security of program data for the City of San Antonio Department of Human Services Head Start Program (DHS Head Start).

Procedure:

DHS Head Start utilizes ChildPlus as the secure database system for storing and tracking client information.

All user account holders are required to complete ChildPlus Access Request and ChildPlus User Security and Confidentiality Agreement forms. Upon completion, the forms are scanned and attached by the ChildPlus Administrator in ChildPlus under each respective user profile.

By accessing the database, staff understands and agrees to abide by all terms of the ChildPlus User Security and Confidentiality Agreement and any applicable state and federal laws regarding Personally Identifiable Information (PII) and Protected Health Information (PHI).

- Education Service Providers are required to designate a staff member to complete the Personnel Profile for all staff members funded by the Head Start or EHS-CCP grant or anyone who works with children or families enrolled in the Head Start or EHS-CCP programs under the Management Module in ChildPlus. Designated staff is defined as preauthorized users in the Management/Personnel Module.
- Upon completion of the Personnel Profile, the designee will notify the ChildPlus Administrator if the user requires access to PII. Not all personnel require a ChildPlus user account.
- The ChildPlus Administrator will confirm with the designee the role of personnel and the types of access required.

- The ChildPlus Administrator will complete a User Security profile in ChildPlus, assign a login username and temporary password, restrict access by location, and designate User Security group(s).
- The ChildPlus Administrator will email the new account holder the login username and temporary password.
- The new account holder will log into ChildPlus and change the temporary password to a permanent password.

Authorized ChildPlus users are granted access under one of the following groupings:

- Staff:
 - A ChildPlus personnel account will be created for all staff. ChildPlus user accounts and access is granted upon the approval of the ChildPlus Access Request Form and the completion of the ChildPlus User Security and Confidentiality Agreement Form.
- Education Service Providers:
 - An assigned ChildPlus Super User for each Service Provider formally requests accounts via email for Service Provider Head Start Staff. Service providers are subject to the confidentiality provisions under the Family Educational Rights and Privacy Act (FERPA).
- Contracted Providers:
 - A Special Projects Manager or designee will request user accounts for contractual providers via email or meeting with the ChildPlus Administrator. To meet the requirements of HIPAA, DHS Head Start requires any contract that include access to client information include an enforceable Business Associate Agreement (BAA). BAAs are documented in the professional services contract with the DHS Head Start.

Implementation of technical policies and procedures for electronic information systems that maintain electronic PII, PHI, and IDEA Part B and C to allow access only to those persons or software programs that have been granted access rights.

All DHS Head Start staff, regardless of position, share the responsibility to safeguard HIPAA, FERPA, PHI, PII, and the Individuals with Disabilities Education Act (IDEA) part B and C data from unauthorized access, acquisition or disclosure. Staff that share PHI, PII and IDEA part B and C electronically must ensure the receiving entity is an authorized recipient of the specific data being delivered.

Only computers configured by ITSD for use on the CoSA network are authorized for accessing ChildPlus.

Staff may utilize a program issued computer or device to access ChildPlus.

Staff ensures the environment in which they are working is secure and only authorized persons are within viewing distance of the authorized user's screen.

Disclosure ChildPlus information to a contractor is authorized but ONLY when an enforceable Business Associate Agreement (BAA) is in place.

All DHS Head Start staff must successfully complete the following trainings:



- CoSA Monthly Security Awareness Training
- CoSA Monthly HIPPA Training
- Completion of these trainings are documented and maintained by the City of San Antonio Human Resources Department.

All DHS Head Start staff must successfully review and acknowledge review and acceptance of CoSA Administrative Directives that include Data Security and Use of Technology.

Education Service Providers and contractors must develop and implement procedures to ensure all staff comply with this procedure and ensure all staff receive training on safeguarding FERPA, HIPAA, PHI, PII and (IDEA) part B and C data.

Performance Standards:

1302.101(b)(4)

	DHS Early Head Start Program Policy		
PDM 19			
SUBJECT	Management of Program Data		
REFERENCE	Program Design and Management		
EFFECTIVE	4/23/18		
Policy Council Approval: 1/22/19	Policy Council Revision: 1/22/19	Governing Body Approval: 2/28/19	Governing Body Revision: 2/28/19
PAGE: 1 of 2			

Policy:

The Head Start Program, including Early Head Start, must establish an internal procedure for proper management of program data for the City of San Antonio Department of Human Services Head Start Program (DHS Head Start).

Procedure:

Implementation of technical policies and procedures for electronic information systems that maintain electronic PII, PHI, and IDEA Part B and C to allow access only to those persons or software programs that have been granted access rights.

All DHS Head Start staff, regardless of position, share the responsibility to safeguard FERPA, HIPAA, PHI, PII, and the Individuals with Disabilities Education Act (IDEA) Part B and C data from unauthorized access, acquisition, or disclosure. Staff that share PHI, PII and IDEA Part B and C electronically must ensure the receiving entity is an authorized recipient of the specific data being delivered.

- Only computers configured by ITSD for use on the CoSA network are authorized for the storage or transport of PHI, PII and/or IDEA Part B and C data.
- Staff may utilize a program issued device to access systems to view and maintain PHI, PII, and IDEA Part B and C files.
- Staff ensures the environment in which they are working is secure and only authorized persons are within viewing distance of the authorized user's screen.
- Disclosure of PII and/or PHI, and/or IDEA Part B and C to a contractor is authorized but ONLY when an enforceable Business Associate Agreement (BAA) is in place.
- Personal devices shall not be used to store or transmit unencrypted protected data.
- Any removable media or storage devices used to transfer PHI, PII, and/or IDEA Part B and C data must be encrypted.

Facsimiles

- If any PHI, PII, and/or IDEA Part B and C data is transmitted via email attachment, the attachment must be protected by a password. The password to access the attachment must be sent to the recipient in a separate email.
- Hard copies (i.e., paper) of any PHI, PII, and/or IDEA Part B and C data must be kept secured in a lockable file cabinet or other secured storage.
- In the event that PHI, PII, and/or IDEA Part B and C data, either hard copy or electronic, are transported between locations, staff must take all precautions to ensure the materials remain secure and must remain in the presence of staff at all times.
 - Any documents received via facsimile, either telefax or online, that contain PHI, PII and/or IDEA Part B and C data shall be uploaded or scanned into appropriate software (i.e., ChildPlus) as soon as possible. Any electronic copies of the facsimile should be saved to the user's desktop; once the upload is completed the file should be deleted and the deletion confirmed. Any hardcopies of the facsimile must be stored in a secure location or destroyed.
 - Any hardcopies of the documents sent via facsimile, either telefax or online, that contain PHI, PII and/or IDEA Part B and C data shall be either stored in a secure location or destroyed.

All DHS Head Start staff must successfully complete the following trainings:

- CoSA Monthly Security Awareness Training
- CoSA Monthly HIPPA Training
- CoSA Employee Security Awareness Day in the Life online training module



Completion of these trainings are documented and maintained by the City of San Antonio Human Resources Department.

All DHS Head Start staff must successfully review and acknowledge review and acceptance of CoSA Administrative Directives that include Data Security and Use of Technology.

Education Service Providers and contractors must develop and implement procedures to ensure all staff comply with this procedure and receive training on safeguarding FERPA, HIPAA, PHI, PII and IDEA Part B and C data.

Performance Standards:

1302.101(b)(4)

	DHS Early Head Start Program Policy		
DISABILITIES 1			
SUBJECT	Individualized Family Service Plan (IFSP) for Children with Delays/ Disabilities		
REFERENCE	Disabilities Services		
EFFECTIVE	10/01/2020		
Policy Council Approval: 9/22/20	Policy Council Revision: 9/22/20	Governing Body Approval: 11/12/20	Governing Body Revision: 11/12/20
PAGE: 1 of 1			

Policy:

The Individualization policy guidelines in Education and Early Child Development Policy and the information provided in the child's IFSP will be used when planning individualized strategies and activities for children with delays/disabilities. Every effort must be made to include children with delays/disabilities in all program activities.



Early Head Start (EHS), Service Providers and City staff will coordinate to receive and review the IFSP as soon as possible after the Initial Assessment or Assessment meetings. If a child enters the EHS Program with a current IFSP, City staff will coordinate with Service Providers to review the IFSP within two weeks of a child's first day of attendance or first home visit.

Service Providers must initiate the implementation of the IFSP immediately after the review by modifying the child's daily activities in accordance with the IFSP and arranging for the provision of related services to accommodate the unique strengths, needs, interests, learning style, and cultural and linguistic background of the child.

Copies of the IFSP will be maintained in the Child's Classroom File. Confidentiality of information will be maintained at all times. Individual child disability information and copies of additional required documents will be entered into Child Plus according to the City of San Antonio Benchmark Due Date Guide and the EHS- Child File Scan Order and Attachment Guide.

Performance Standard(s):

1302.61; 1302.62; 1302.63; 1303.75

	DHS, Early Head Start Program Policy		
EDUCATION 5			
SUBJECT	Development and Behavior Screening		
REFERENCE	Education and Early Childhood Development		
EFFECTIVE	8/1/19		
Policy Council Approval: 9/22/20	Policy Council Revision: 9/22/20	Governing Body Approval: 11/12/20	Governing Body Revision: 11/12/20
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Policy:

The Early Head Start Program uses the Ages and Stages Questionnaire (ASQ-3) as the developmental screening and the Ages and Stages Questionnaire Social and Emotional, Second Edition (ASQ: SE-2) as the behavioral screening.

Service Providers must complete the ASQ 3 and ASQ: SE-2 in collaboration with each child's parent/guardian on or before the 45th calendar day after the child first attends the program. Returning children will not be rescreened each program year. Developmental and behavioral screenings must be completed within the timeframe to identify early concerns regarding a child's developmental, sensory, behavioral, motor, language, social, cognitive, perceptual and emotional skills so appropriate referrals are made.

The ASQ-3 and ASQ: SE-2 will not be completed by the teacher or home visitor. If the parent or guardian needs assistance completing the questionnaire, the teacher, home visitor or other staff member may provide the most appropriate accommodation for completion. The ASQ-3 and ASQ: SE-2 will be distributed by the Service Provider no more than two weeks prior to the first day of a child's entry into the center for center-based services. For home-based services the ASQ-3 and ASQ:SE-2 will be distributed no more than two weeks prior to the first home visit. The screenings may not be distributed during Early Head Start (EHS) enrollment, or family meetings. To the greatest extent possible, the screening procedures must be sensitive to the child's cultural background and home language.

EHS Program and Service Providers will work together to develop a comprehensive system to ensure proper training, administration and monitoring of the screening tools that includes, at a minimum, the following:



- Identifying appropriate staff responsible for administering, scoring, and follow-up and referrals.
- Ensuring the appropriate version is utilized for child's age and language.

- Ensuring proper completion of the screening tool.
- Ensuring accurate scoring of the screening tool.
- Establishing timeframes for follow-ups, referrals, and documentation
- Following the *City of the San Antonio Benchmark and Due Date Guide* and the *EHS File Scan Order and Process Guide*.
- Completing routine internal monitoring of child files.
- Monitoring the fidelity of screenings

EHS Program will develop and implement procedures to address the use of the ASQ-3 and ASQ: SE-2 with children with an identified disability or Individual Family Service Plan (IFSP). A child is not automatically disqualified from receiving a developmental or behavioral screening if they have an identified disability or IFSP. Sensitivity to the parent/guardian should always be a priority. Procedures may include a determination to complete only certain sections of the ASQ-3 or the ASQ: SE-2. If it is determined by the teacher, home visitor, or other early childhood professional that it is not appropriate for a parent/guardian to complete any section of the developmental or behavioral screening, the information supporting this determination must be documented in Child Plus according to the *ChildPlus Data Entry Guide*.

Performance Standard:

1302.33;1302.25

	DHS, Early Head Start Program Policy		
EDUCATION 8			
SUBJECT	Child File		
REFERENCE	Education and Early Childhood Development		
EFFECTIVE	10/1/2020		
Policy Council Approval: 9/22/20	Policy Council Revision: 9/22/20	Governing Body Approval: 11/12/20	Governing Body Revision: 11/12/20
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Policy:

The Early Head Start (EHS) Program and Service Providers will work together to develop a system to ensure that each child has a Child File that organizes and contains multiple sources of information used for ongoing assessments and instructional planning.



The Child File for center-based services will contain the following:

- Documentation from home visits and parent conferences including parent/guardian input
- Work samples
- Developmental Screening
- Social and Emotional Screening
- Beginning, Middle and End of year formal assessment summary information
- Transition activities (if applicable)
- IFSP, if applicable
- Other items pertaining to educational development
- The Child File for home-based services will contain the following: Work samples
- Developmental Screening
- Social and Emotional Screening
- Beginning, Middle and End of year formal assessment summary information
- Transition activities (if applicable)
- IFSP, if applicable
- Other items pertaining to educational development

The Service Providers must develop a system to ensure that the Child File is located in the teacher's classroom or home visitor's office, kept confidential, and available for parents to review upon request with the teacher or home visitor. The file must also be accessible to parents/guardians and monitors/reviewers upon request.

Performance Standard(s):

1302.30-1302.34;1302.35

	DHS, Early Head Start-Child Care Partnership Program Policy		
EDUCATION 9			
SUBJECT	Multidisciplinary Staffing		
REFERENCE	Education and Early Childhood Development		
EFFECTIVE	10/1/20		
Policy Council Approval:	Policy Council Revision:	Governing Body Approval:	Governing Body Revision:
PAGE: 1 of 1			

Policy:



The Early Head (EHS) Program and Service Providers will work together to develop a system in place for regular communication among program staff to facilitate quality outcomes for children and families. Service Providers will schedule at least two Multidisciplinary Staffing (MDS) meetings annually for every enrolled child. If a child enters the program after January 31st, a minimum of one MDS meeting will be held before the last day of the program year.

The MDS meeting is a documented and planned communication tool utilized to create a cohesive team approach to discuss the strengths and needs of children and families. The Center Director or designee, Family Support Staff, and Teachers or Home Visitor, are required to participate in the MDS. Content area coordinators responsible for Education, Health, ERSEA, Mental Health, Transportation, Nutrition, Disabilities and other related services may be required to attend based on the child/family needs.

The EHS Program and Service Providers will work to develop and maintain a record-keeping system to provide accurate and timely information regarding children, families, and staff and must ensure appropriate confidentiality of this information. The MDS documentation must include the completion date of the MDS, signatures of all in attendance, and topics covered. A system must be in place to ensure that completion dates of the MDS are entered and the MDS document is scanned into Child Plus and meets the *City of the San Antonio Benchmark Due Date Guide, applicable ChildPlus Data Entry Guide*, and the *Early Head Start File Scan Order and Process Guide*.

Performance Standard(s):

1302.101(b)(2)(3); 1302.33; 1302.34; 1302.35

	DHS, Early Head Start Program Policy		
EDUCATION 12			
SUBJECT	Classroom Observations		
REFERENCE	Education and Early Childhood Development		
EFFECTIVE	10/1/2020		
Policy Council Approval: 9/22/20	Policy Council Revision: 9/22/20	Governing Body Approval: 11/12/20	Governing Body Revision: 11/12/20
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Policy:

The Early Head Start (EHS) Program, City Staff and Service Providers will work together to develop and implement a system for conducting monthly classroom observations for center-based services. Service Providers will review (at a minimum) the following areas throughout the program year:



- Indoor classroom environment
- Outdoor classroom environment
- Health & Safety
- Curriculum / lesson plans / daily schedule
- Teacher / child interactions and relationships
- Nutrition
- Individualization
- Family Engagement

All areas listed above must be reviewed at least once every six months (Aug-Jan and Feb- July) in each classroom. Service Providers must also ensure that all classrooms are in compliance with Head Start, City of San Antonio, and Texas Health and Human Services Child Care Regulation Minimum Standards, policies, and guidance.

Classroom observation documentation will be shared and used to guide professional development.

Performance Standards:

1302.31;1302.35

	DHS Early Head Start Program Policy		
EDUCATION 17			
SUBJECT	Coaching		
REFERENCE	Education and Early Childhood Development		
EFFECTIVE	10/1/2020		
Policy Council Approval: 9/22/20	Policy Council Revision: 9/22/20	Governing Body Approval: 11/12/20	Governing Body Revision: 11/12/20
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Policy:

The Early Head Start (EHS) Program and Service Providers will implement a researched-based coordinated coaching strategy for education staff. EHS staff and Service Providers will develop and implement procedures to identify strengths, areas of needed support, and which staff would benefit most from coaching.

Service providers must collaborate with the EHS Program to designate a qualified staff member who has the knowledge, skills and abilities to serve as a Peer/Instructional Coach. The Peer/Instructional Coach will provide ongoing coaching and support to teachers and home visitors to strengthen their skills and help increase the quality of care and child outcomes.

Ongoing Coaching will include reviewing the following areas for center-based teachers:

- Indoor classroom environment
- Outdoor environment
- Health & Safety
- Curriculum Implementation and Fidelity
- Lesson plans and daily schedules
- Teacher/child interactions
- Family engagement



Ongoing Coaching will include reviewing the following areas for home visitors:

- Promoting the role of the parent as the child's teacher through experiences focused on the parent-child relationship
- Health & Safety
- Curriculum Implementation and Fidelity
- Lesson Plans
- Family Engagement

All coaching consultations will be documented.

Performance Standard

1302.92(c);1302.35

	DHS Early Head Start Program Policy		 HEAD START City of San Antonio Department of Human Services
ENVIRONMENTAL HEALTH AND SAFETY 3			
SUBJECT	Hygiene & Cleaning Practices		
REFERENCE	Environmental Health and Safety		
EFFECTIVE	8/1/2016		
Policy Council Approval: 7/28/20	Policy Council Revision: 7/28/20	Governing Body Approval: 8/13/20	Governing Body Revision: 8/13/20
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Policy:

Early Head Start (EHS) Program Service Providers will develop and implement systems that promote hand washing, hygiene and sanitation and disinfecting of the classroom including equipment and materials. Providers must ensure staff is trained on the procedures and documentation of training must be maintained.

Service Providers will follow guidance from the Office of Head Start (OHS) or recommendations made by the Centers for Disease Control and Prevention, Child Care Regulation, the City of San Antonio Metro Health Department, and/or Caring for Our Children National Health and Safety Standards Guidelines for Early Care and Education Programs when establishing procedures for hygiene, cleaning, disinfecting, and sanitation practices.

Hand washing

- Staff, volunteers, and children must wash their hands with soap and running water at a minimum during the following times:
 - Upon arrival,
 - Before and after diapering or toilet use
 - Before food preparation, handling, or any other food-related activity
 - Before and after eating
 - Whenever hands are contaminated with blood or other bodily fluids
 - After handling pets or other animals
 - After outdoor activities
 - Before and after playing in a water/sand play table
 - Any other time there is reason to believe the child has come in contact with substances that could be harmful to the child

- Staff and volunteers must also wash their hands with soap and running water:
 - Before and after giving medication
 - Treating or bandaging a wound
 - After assisting a child with toilet use
 - After using any cleaners or toxic chemicals; and
 - After removing gloves

Hygiene



- Easily accessible nonporous, on-latex, disposable gloves are to be worn by all staff when they are in contact with blood or bodily fluids.
- Bodily fluids should be cleaned and disinfected immediately in keeping with Head Start Performance Standards and Texas Health and Human Services Commission/Child Care Licensing Minimum Standards.
- Any tools and equipment used to clean bodily fluids should be cleaned, disinfected immediately, and blood-contaminated materials must be disposed of properly.
- Hand Sanitizers, pre-moistened towelettes, and waterless hand cleaners are not allowed to replace hand-washing and should not be accessible or used on children.

Sanitation

- Toys and equipment that are placed in a child's mouth, or otherwise contaminated by body secretion or excrement, must be sanitized before handling by another child
- Cloth toys must be washed at least weekly and when contaminated
- All linens must be washed at least weekly and when soiled or before another child uses them
- All sleeping equipment must be sanitized before a different child uses it and when soiled
- Water play tables must be empty, and toys used in water tables must be sanitized daily, children and caregivers must wash their hands before using the water table
- Sand boxes and tables must be maintained in a sanitary manner
- All garbage must be inaccessible to children and managed to keep the child-care center inside and outside, free of insects, rodents, and offensive odors and disposing of it according to local and state requirements
- All floors, ceilings and walls must be kept in good repair and clean. Paint used at the center must be lead-free
- All areas in the center used by children will be kept heated, lighted and ventilated
- All tabletops, furniture and other similar equipment used by children when soiled or contaminated with matter such as food, body secretions or excrement will be sanitized
- All cleaning supplies and other toxic materials will be marked and kept separate from food and inaccessible to children
- Hazardous materials will be stored and disposed of as recommended by the manufacturer

Performance Standard:

1302.47(b)(6)(i)(ii)(iii)

	DHS Early Head Start Program Policy		
ENVIRONMENTAL HEALTH AND SAFETY 4			
SUBJECT	Management of Illness / Conditions of Short-Term Exclusions and Admittance		
REFERENCE	Environmental Health and Safety		
EFFECTIVE	8/1/2016		
Policy Council Approval: 7/28/20	Policy Council Revision: 7/28/20	Governing Body Approval: 8/13/20	Governing Body Revision: 8/13/20
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Policy:

Early Head Start (EHS) Service Providers will develop and implement procedures for children and staff who are ill. Procedures should include:

- Practices to control an infectious disease outbreak
- Notification of any reportable illnesses to include local or state public health agencies
- Training on accommodations that must be made for children with specific health and safety needs
- Practices to ensure confidentiality of children's health and safety needs
- Exclusion criteria

A child cannot be denied enrollment based on a disability, illness or chronic health condition or its severity.

Early Head Start (EHS) Program Service Providers may temporarily exclude a child with an acute injury or illness from program participation for a short-term period when the child's needs cannot be readily accommodated or if they pose a significant risk to the health and safety to themselves or anyone that may come in contact with them.

Providers will create and implement procedures to ensure that appropriate staff is informed and trained on any accommodations that must be made for children with specific health and safety needs. Information about any child's health or safety needs should be kept confidential.



Providers will follow guidance from the Office of Head Start (OHS) or recommendations made by the Centers for Disease Control and Prevention, Child Care Regulation, the City of San Antonio Metro Health Department, and/or Caring for Our Children National Health and Safety Standards Guidelines for Early Care and Education Programs when establishing procedures.

Performance Standard:

1302.47 (b)(7)(iii)

References:

Texas Department of State Health Services Communicable Disease Chart for Schools and Child-Care Centers

	DHS, Early Head Start- Child Care Partnership Program Policy		
PDM 1			
SUBJECT	Program Monitoring		
REFERENCE	Program Design and Management		
EFFECTIVE	8/1/2016		
Policy Council Approval: 4/23/19	Policy Council Revision: 4/23/19	Governing Body Approval: 5/23/19	Governing Body Revision: 5/23/19
PAGE: 1 of 3			

Policy:

The Early Head Start ~~—Child Care Partnership—~~Program (EHS-~~CCP~~) will develop and implement a process of ongoing monitoring and continuous improvement of the service delivery and program operations. The program will abide by all local, state, and federal regulations. The EHS-~~CCP~~ will provide high-quality program services, share strategies, and communicate plans to ensure child and adult safety.

The EHS-~~CCP~~ Program will use the following monitoring systems:

- Service Provider level monitoring systems for ongoing monitoring efforts and activities to include regular site visits to all EHS-~~CCP~~ Service Providers and classrooms
- Site visits to all EHS-~~CCP~~ centers will be announced and unannounced
- Service Provider level monitoring through the Texas Health and Human Services Commission/ Child Care [Licensing Regulation](#) (THHSC)
- Service Provider level monitoring through the Texas Rising Star, Texas ~~Workforce-Commissions' Child Care Subsidy program~~ [Quality Rating and Improvement System applicable to the EHS-CCP providers only](#)
- ~~Grantee-City~~ level monitoring system that ensures Service Providers ~~are-have~~ effective oversight of service delivery systems and remain in compliance with all local, state, and federal regulations
- Periodic collecting and reporting of program data to the ~~granteeCity~~, by Service Providers
- Utilization of Child Plus by the ~~Grantee-City~~ and the Service Providers to collect and record information about children and families for data analysis, evaluation and program improvement
- Collaborative review of program information for planning and future development ~~decisions~~
- Annual Self-Assessment
- Managed by Information (MBI) Reporting
- Content Area Data Reports

The EHS-CCP will develop procedures for ongoing monitoring of the program. These procedures will provide guidance and expectations of how the EHS-CCP program will monitor internally and externally. These procedures will also include the requirements for reporting findings.

EHS-CCP will establish a monitoring model that will help ensure timely and effective delivery of services and provide content area expertise and support to the EHS-CCP Service Providers. EHS-CCP will focus on direct monitoring, reviewing, and analyzing the results of Service Providers.

EHS-CCP will monitor required program tasks and responsibilities to ensure completion within required timelines and according to guidelines provided in the Head Start Program Performance Standards, federal and state regulations, and local laws and rules.

Monitoring of the EHS-CCP Program is a continuous process, and all findings are shared with the EHS Senior Special Projects Manager, when needed with the Head Start Administrator, to determine the level of compliance with the Head Start Program Performance Standards, local, state, and federal regulations. The results of ongoing monitoring will be shared with the Head Start Administrator, Leadership Team, Management Team, the Governing Body and Policy Council, and the Governing Body to determine the level of compliance with Head Start Performance Standards, Federal, State and local laws and rules.

The EHS-CCP Program will follow-up on monitoring issues or concerns to ensure corrective action/corrections and implementation of quality improvement/corrective action plans. EHS-CCP may provide training and technical assistance and resources to assist the Service Providers in developing and implementing a corrective action and quality improvement plan.

The EHS-CCP program will establish an annual monitoring calendar of monitoring activities and will share with the Service Providers.

With the participation of stakeholders, Head Start parents, Policy Council members, Governing Body members, community members, and program staff, the City will conduct the Annual Self-Assessment by utilizing program data. The results will be shared with all stakeholders. The Grantee will conduct the annual Self-Assessment by utilizing program data. Results are shared with stakeholders including parents, Policy Council members, Governing Body members, community members, and program staff.

Service Provider Responsibilities:

Service Providers are responsible for the following:

- Allowing access to EHS-CCP program monitor for scheduled and unscheduled visits
- Taking corrective action
- Requesting assistance from the Grantee when needed
- Reporting any results pertinent to the operations of the Service Provider
- Implementing a quality improvement/corrective action plan that prevents reoccurrence of previous findings

Monitoring Approach:

~~Three-Tiered~~ **Three-Tiered Approach for EHS-CCP providers**

Ongoing monitoring for the EHS-CCP Program is a three-tiered approach.

- First - Monitoring is completed by the THHSC for all Service Providers.
- Second -The EHS-CCP Program provides monitoring to ensure understanding and compliance with the Head Start Performance Standards and expectations.
- Third –
 - For EHS-CCP providers - The State of Texas Rising Star (TRS) system recognized as the Quality Rating Improvement System for the state of Texas. Upon request by the EHS Program, all monitoring documents must be made available within reasonable time.
 - For EHS provider – Service provider will utilize their defined internal monitoring system. Upon request by the EHS Program, all monitoring documents must be made available within reasonable time.

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Ongoing monitoring continues to provide recommendations to enhance the quality of care and services to children and to provide safe and healthy environments through the following service areas:

- Environmental Health and Safety
- Education Services
- Health /Dental Services
- Nutrition
- Disabilities
- Wellness Support Services
- Family & Community Support
- ERSEA
- Human Resources
- Transportation

The EHS-CCP Program will utilize the results of monitoring efforts and activities to further evaluate compliance with Head Start Performance Standards and regulations. Service Providers will utilize their appropriate internal monitoring systems, to include Child Plus when applicable, to document all results. Upon request by the City, all monitoring documents must be made available within reasonable time.

Service Provider Corrective Action:

Following the receipt of results from a monitoring project completed by the City, the Service Providers will:

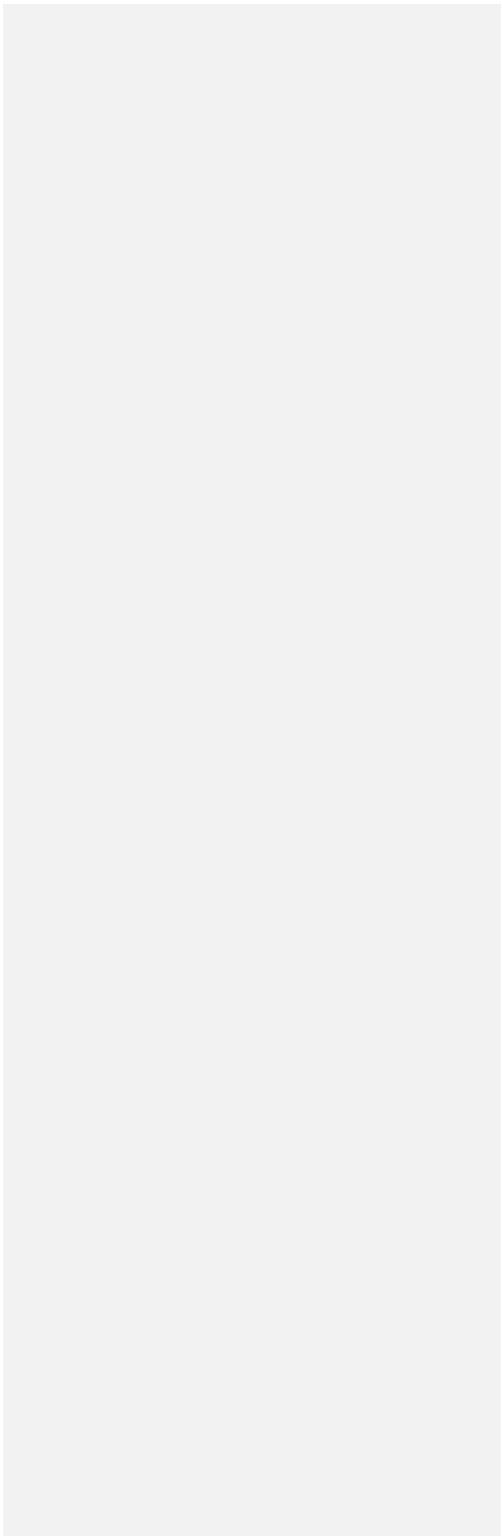
- Complete all Correction Action Plans (CAPs) in Child Plus within 15 business days
- Address any findings related to child health and safety that is an immediate threat to children within 24 hours
- Develop and respond to corrective action plans as requested by the City
- ~~The Service Provider may request extension for completion of a CAP~~



The Service Provider or service area manager may request an extension prior to the initial deadline along with justification if they are unable to meet the deadline for the completion of a CAP. Based on the justification, the extension may or may not be granted. The [Senior](#) Special Projects Manager over the EHS-CCP Program or Head Start Administrator may give permission and/or add provisions related to the CAPs and approve as needed.

Performance Standard(s):

Subpart J-Program Management and Quality Improvement
1302.100 – 1302.103 (a-b)

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	DHS Early Head Start-Child Care Partnership Program Policy		
PDM 7			
SUBJECT	Identification and Reporting of Child Abuse and Neglect		
REFERENCE	Program Design and Management		
EFFECTIVE	8/1/2016		
Policy Council Approval: 7/28/20	Policy Council Revision: 7/28/20	Governing Body Approval: 8/13/20	Governing Body Revision: 8/13/20
PAGE: 1 of 2			

Policy:

The Head Start Program, including Early Head Start ~~Child Care Partnership Program~~ (EHS-~~CCP~~) must develop and implement procedures to respond to suspected or known child abuse whether it occurs at or away from the program.

All Head Start staff including Service Provider staff, as well as teachers, teacher assistants, floaters, substitutes, a site personnel, and consultants and volunteers must follow the Service Provider's policies and procedures regarding child abuse and neglect.

The EHS-~~CCP~~Senior Special Projects Manager must be notified within 24 hours of an incident that has occurred within the EHS-~~CCP~~ Program. The Head Start Administrator must also be notified of any report that has been made for suspected child abuse or neglect occurring away from the EHS-~~CCP~~ within 24 hours of notification. Such official incident reporting must be provided in writing.

Additionally, when any Head Start Program Staff, contractors, Service Providers, Child Care Center staff or Volunteers witness or suspect child abuse or neglect they must make a report to the Texas Department of Family and Protective Services (TDFPS) within 48 hours. According to the State of Texas, Title 5, Chapter 261 of the Family Code, "child abuse is an act or omission that endangers or impairs a child's physical, mental or emotional health and development." Child abuse may take several forms including, but not limited to:

- Physical, mental or emotional injury
- Sexual abuse
- Sexual exploitation
- Physical neglect
- Medical neglect
- Inadequate supervision

In filing a report, personnel will follow state regulations regarding the timeframes that reports must be made, the information that must be reported, and confidentiality of reported information.

Service Providers will develop and implement procedures to notify the parents/guardians of any suspected or known child abuse incidents occurring within the EHS-CCP Program. EHS-CCP City staff and Service Providers must also comply with Texas Health and Human Services Commission/Child Care Licensing Minimum Standards.

Should the Service Provider be informed that a report has been made for suspected child abuse or neglect occurring outside the Head Start Program, they must comply with notification requirements outlined in this policy.

All EHS-CCP staff, including teachers, teacher assistants, and all other campus or site personnel, consultants and volunteers receive training on procedures for identifying and reporting child abuse or neglect. EHS-CCP staff are expected to fully cooperate with Texas Department of Family Protective Services, Texas Health and Human Services Child Care Licensing and other applicable agency personnel to report any suspected or known incidents.



Performance Standard(s):

1302.41; 1302.47(5)(i); 1302.90; 1302.92(b)(2); 1302.102
1302.47(b)(4)(i)(K); 1302.47(b)(5)(i); 1302.53(a)(2)(iii); 1302.90(b)(2); 1302.92(b)(2)
1302.102(d)(1)(ii)(A); 1303.22(c)(5)(iii); 1303.22(c)(8)

Resources:

Office of the Texas Attorney General, "What Can We Do about Child Abuse Part 2":
https://www.texasattorneygeneral.gov/ag_publications/txts/childabuse2.shtml

Family Code, Chapter 261. Investigation of Report of Child Abuse or Neglect
<http://www.statutes.legis.state.tx.us/Docs/FA/htm/FA.261.htm>

	DHS Early Head Start-Child Care Partnership Program Policy		
PDM 8			
SUBJECT	Community Complaints		
REFERENCE	Program Design and Management		
EFFECTIVE	8/1/2016		
Policy Council Approval: 7/28/20	Policy Council Revision: 7/28/20	Governing Body Approval: 8/13/20	Governing Body Revision: 8/13/20
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Policy:



The Head Start Program, including Early Head Start, encourages a climate of open communication between parents, program employees, and community members. Head Start and Education Service Provider staff are available to provide support and to assist any parent or community resident who has a complaint, problem or concern.

Parents/guardians and community residents are encouraged to attempt to resolve Head Start complaints, problems or concerns at the center/school level by talking to a teacher, Family Support Worker, center director or principal. Parent/Guardians may at any time also talk directly to any Head Start staff member or Head Start Administrator about any issues or concern. Concerns/complaints may also be submitted using the comment section of the Head Start website at www.saheadstart.org.

If attempts to informally resolve the concern/problem are not successful, the following formal steps may be taken:

1. Call, email, meet with, or provide a written statement to the Head Start Education Service Provider Director. The Director will provide the parent/guardian or community resident a recommendation for resolution of the concern/problem within five business days of receipt of the issue. The Director may request additional time if required to resolve the concern/problem. If not resolved, parents/guardians or community resident may proceed to Step 2.
2. Call, email, meet with, or provide a written statement to the City of San Antonio Head Start Program Administrator. The Head Start Administrator will have five business days to resolve the concern/problem. The Head Start Administrator may request additional time to resolve the concern/problem. If not resolved, parents/guardians or community resident may proceed to Step 3.

3. Submit a signed, written statement to the City of San Antonio City Council's Governing Board/Advisory Committee. The statement shall describe in detail the complaint, problem or concern and steps taken to resolve the issue. The City of San Antonio City Council's Governing Board/Advisory Committee will provide a written response within 15 business days of receipt of the written statement. The City of San Antonio City Council's Governing Board is the last formal step in resolving parent/community resident complaints or concerns and the resolution is final.

	DHS Early Head Start-Child Care Partnership Program Policy		
PDM 9			
SUBJECT	Critical Incident Reporting		
REFERENCE	Program Design and Management		
EFFECTIVE	8/1/2016		
Policy Council Approval: 7/28/20	Policy Council Revision: 7/28/20	Governing Body Approval: 8/13/20	Governing Body Revision: 8/13/20
PAGE: 1 of 1			

Policy:

The Head Start Program, including Early Head Start-~~Child Care Partnership Program~~ (EHS-~~CCP~~) must develop and implement a system for Critical Incident Reporting (CIR). All staff must be trained on incident reporting.



A critical incident includes, but is not limited to:

- Suspected child abuse which may or may not have occurred during service hours.
- Allegations of child abuse/neglect against any EHS-~~CCP~~ staff member, volunteer or contractor, injury to a child due to lack of supervision or unacceptable methods of child guidance
- Incidents which may have placed a child, family member or staff in danger, including any incidents in which a child was left unsupervised
- Health incidents and illnesses, which include, but are not limited to:
 - Injuries that require urgent medical attention by a health-care professional
 - Child or staff member leaving by emergency medical transport
 - Contagious diseases that could lead to an outbreak
 - Child receiving outside medical attention at any point in time for an injury sustained during EHS-~~CCP~~ program hours
- Any incident which has the potential to generate negative media coverage
- Any media inquiry/coverage of the program
- Unplanned interruption in EHS-~~CCP~~ Program services
- Closure of any facility or part of a facility, including outdoor play areas
- Accidents involving vehicles that transport children and families

When applicable, parents/guardians must be notified of critical incidents within 24 hours of occurrence. Providers must also provide notification to the EHS-~~CCP~~ Senior Special Projects Manager or designee within 24 hours.

Performance Standard(s):

1302.47(c); 1302.102(d)(1)(ii); 1304.12; 1303.79(b)(3)

	DHS Early Head Start-Child Care Partnership Program Policy		
PDM 18			
SUBJECT	Program Data – Access and Security		
REFERENCE	Program Design and Management		
EFFECTIVE	4/23/18		
Policy Council Approval: 1/22/19	Policy Council Revision: 1/22/19	Governing Body Approval: 2/28/19	Governing Body Revision: 2/28/19
PAGE: 1 of 3			

Policy:

The Head Start ~~P~~program, including Early Head Start (EHS), must establish an internal procedure for proper access and security of program data for the City of San Antonio Department of Human Services Head Start ~~and Early Head Start Child Care Partnership (EHS-CCP)~~ Program (DHS Head Start).

Procedure:

DHS Head Start utilizes ChildPlus as the secure database system for storing and tracking client information.

All user account holders are required to complete ChildPlus Access Request and ChildPlus User Security and Confidentiality Agreement forms. Upon completion, the forms are scanned and attached by the ChildPlus Administrator in ChildPlus under each respective user profile.

By accessing the database, staff understands and agrees to abide by all terms of the ChildPlus User Security and Confidentiality Agreement and any applicable state and federal laws regarding Personally Identifiable Information (PII) and Protected Health Information (PHI).

- Education Service Providers are required to designate a staff member to complete the Personnel Profile for all staff members funded by the Head Start or EHS-CCP grant or anyone who works with children or families enrolled in the Head Start or EHS-CCP programs under the Management Module in ChildPlus. Designated staff is defined as preauthorized users in the Management/Personnel Module.
- Upon completion of the Personnel Profile, the designee will notify the ChildPlus Administrator if the user requires access to PII. Not all personnel require a ChildPlus user account.
- The ChildPlus Administrator will confirm with the designee the role of personnel and the types of access required.

- The ChildPlus Administrator will complete a User Security profile in ChildPlus, assign a login username and temporary password, restrict access by location, and designate User Security group(s).
- The ChildPlus Administrator will email the new account holder the login username and temporary password.
- The new account holder will log into ChildPlus and change the temporary password to a permanent password.

Authorized ChildPlus users are granted access under one of the following groupings:

- Staff:
 - A ChildPlus personnel account will be created for all staff. ChildPlus user accounts and access is granted upon the approval of the ChildPlus Access Request Form and the completion of the ChildPlus User Security and Confidentiality Agreement Form.
- Education Service Providers:
 - An assigned ChildPlus Super User for each Service Provider formally requests accounts via email for Service Provider Head Start Staff. Service providers are subject to the confidentiality provisions under the Family Educational Rights and Privacy Act (FERPA).
- Contracted Providers:
 - A Special Projects Manager or designee will request user accounts for contractual providers via email or meeting with the ChildPlus Administrator. To meet the requirements of HIPAA, DHS Head Start requires any contract that include access to client information include an enforceable Business Associate Agreement (BAA). BAAs are documented in the professional services contract with the DHS Head Start.

Implementation of technical policies and procedures for electronic information systems that maintain electronic PII, PHI, and IDEA ~~Part~~ part B and C to allow access only to those persons or software programs that have been granted access rights.

All DHS Head Start staff, regardless of position, share the responsibility to safeguard HIPAA, FERPA, PHI, PII, and the Individuals with Disabilities Education Act (IDEA) part B and C data from unauthorized access, acquisition or disclosure. Staff that share PHI, PII and IDEA part B and C electronically must ensure the receiving entity is an authorized recipient of the specific data being delivered.

Only computers configured by ITSD for use on the CoSA network are authorized for accessing ChildPlus.

Staff may utilize a ~~laptop program issued computer or device and a secure means such as VPN, Workspace or Citrix~~ to access ChildPlus.

Staff ensures the environment in which they are working is secure and only authorized persons are within viewing distance of the authorized user's screen.

Disclosure ChildPlus information to a contractor is authorized but ONLY when an enforceable Business Associate Agreement (BAA) is in place.

All DHS Head Start staff must successfully complete the following trainings ~~annually~~:



- ~~CoSA HIPAA 101 Privacy online training module~~
- ~~CoSA HIPAA 102 Security online training module~~
- ~~CoSA Employee Security Awareness Day in the Life online training module~~
- CoSA Monthly Security Awareness Training
- CoSA Monthly HIPPA Training
- Completion of these trainings are documented and maintained by the City of San Antonio Human Resources Department.

All DHS Head Start staff must successfully review and acknowledge review and acceptance of CoSA Administrative Directives that include Data Security and Use of Technology.

Education Service Providers and contractors must develop and implement procedures to ensure all staff comply with this procedure and ensure all staff receive training on safeguarding FERPA, HIPAA, PHI, PII and (IDEA) part B and C data.

Performance Standards:

1302.101(b)(4)

	DHS Early Head Start-Child Care Partnership Program Policy		
PDM 19			
SUBJECT	Management of Program Data		
REFERENCE	Program Design and Management		
EFFECTIVE	4/23/18		
Policy Council Approval: 1/22/19	Policy Council Revision: 1/22/19	Governing Body Approval: 2/28/19	Governing Body Revision: 2/28/19
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Policy:

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Procedure:

Implementation of technical policies and procedures for electronic information systems that maintain electronic PII, PHI, and IDEA ~~P~~part B and C to allow access only to those persons or software programs that have been granted access rights.

All DHS Head Start staff, regardless of position, share the responsibility to safeguard FERPA, HIPAA, PHI, PII, and the Individuals with Disabilities Education Act (IDEA) ~~P~~part B and C data from unauthorized access, acquisition, or disclosure. Staff that share PHI, PII and IDEA ~~P~~part B and C electronically must ensure the receiving entity is an authorized recipient of the specific data being delivered.

- Only computers configured by ITSD for use on the CoSA network are authorized for the storage or transport of PHI, PII and/or IDEA ~~P~~part B and C data.
- Staff may utilize a program issued device ~~laptop and a secure means such as VPN, Workspace or Citrix~~ to access systems to view and maintain PHI, PII, and IDEA ~~P~~part B and C files.
- Staff ensures the environment in which they are working is secure and only authorized persons are within viewing distance of the authorized user's screen.
- Disclosure of PII and/or PHI, and/or IDEA ~~P~~part B and C to a contractor is authorized but ONLY when an enforceable Business Associate Agreement (BAA) is in place.
- Personal devices shall not be used to store or transmit unencrypted protected data.
- Any removable media or storage devices used to transfer PHI, PII, and/or IDEA ~~P~~part B and C data must be encrypted.

Facsimiles

- If any PHI, PII, and/or IDEA ~~P~~art B and C data is transmitted via email attachment, the attachment must be protected by a password. The password to access the attachment must be sent to the recipient in a separate email.
- Hard copies (i.e., paper) of any PHI, PII, and/or IDEA ~~P~~art B and C data must be kept secured in a lockable file cabinet or other secured storage.
- In the event that PHI, PII, and/or IDEA ~~P~~art B and C data, either hard copy or electronic, are transported between locations, staff must take all precautions to ensure the materials remain secure and must remain in the presence of staff at all times.
 - Any documents received via facsimile, either telefax or online, that contain PHI, PII and/or IDEA ~~P~~art B and C data shall be uploaded or scanned into appropriate software (i.e., ChildPlus) as soon as possible. Any electronic copies of the facsimile should be saved to the user's desktop; once the upload is completed the file should be deleted and the deletion confirmed. Any hardcopies of the facsimile must be stored in a secure location or destroyed.
 - Any hardcopies of the documents sent via facsimile, either telefax or online, that contain PHI, PII and/or IDEA ~~P~~art B and C data shall be either stored in a secure location or destroyed.

All DHS Head Start staff must successfully complete the following trainings~~annually~~:

- ~~• CoSA HIPAA 101 Privacy online training module~~
- ~~• CoSA HIPAA 102 Security online training module~~
- ~~• CoSA Monthly Security Awareness Training~~
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Performance Standards:

1302.101(b)(4)