

Head Start Facilities Report



FISCAL YEAR 2015



Office of Head Start
Administration for Children and Families
U.S. Department of Health and Human Services

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Executive Summary

Head Start promotes school readiness by enhancing the physical, social, and cognitive development of children through educational, health, nutritional, social, and other services. It also recognizes the important role of parents, encouraging them to participate in a variety of activities and experiences that support and foster their children's development and learning, and helping them to progress toward their educational, literacy, and employment goals. Extant literature suggests that achievement and attitudes toward school is correlated with building quality, bright and comfortable surroundings, newer buildings, and better thermal comfort and air quality (e.g., Schneider, 2002). Head Start centers are where services are provided in communities that are generally lacking infrastructures that support early learning. As a result, it is imperative that Head Start provides high quality facilities to children and their families to set a foundation for success.

This report uses multiple sources of data to evaluate Head Start and Early Head Start facilities:

- Monitoring data from FY 2015 Environmental Health and Safety (EnvHS) review events, which included observations of 5,513 centers from 562 grantees
- Self-report data on 3,603 Head Start and Early Head Start centers (e.g., age of the center, recent renovation)
- Grantee administrative and characteristic data collected and archived in the Head Start Enterprise System (HSES)

Data on Head Start centers observed in Fiscal Year (FY) 2015 monitoring reviews indicate that many Head Start centers are older buildings. Over half of the centers were reported to have been built before 1990 with over a third reported to have been built before 1970. Less than half of the monitored centers built before 1970 have been renovated. The average age of the centers is approximately 40 years old with the oldest center reported as 176 years old.

Most Head Start centers appear to be suitable, sustainable, and functional. Some observed buildings have issues that are expected in older buildings, such as poorly maintained or unclean environments and safety code issues (e.g., fire safety). Age and weather pose challenges, including weatherization, deterioration, structural defects, and maintenance of playground safety. Due to the age of the centers and the fact that exposure to weather compounds problems, it is expected that the conditions will worsen over time. Additional funding for maintenance and repair, renovation, and some new construction would support Head Start grantees' efforts to maintain centers suitable for providing Head Start services.

I. Introduction

Head Start, created and first authorized in 1965 under the Head Start Act (42 USC 9801, et seq.), is a national program that provides comprehensive child development services primarily to low-income children (ages zero to five) and their families. Head Start promotes school readiness by enhancing the physical, social, and cognitive development of children through educational, health, nutritional, social, and other services. Head Start centers are where services are provided in communities that are generally lacking infrastructures that support early learning. As a result, it is imperative that Head Start provides high quality facilities to children and their families to set a foundation for success.

There is a body of research in the area of school and child care facilities and the relationship of the conditions of those facilities to children's academic performance and health. Studies that measure school conditions show improved scores on standardized tests as school conditions improve (Schneider, 2002; Earthman, Cash, & Van Berkum, 1995; Earthman & Lemasters; 1996, 1998). On the other hand, buildings with major outstanding repair needs have higher absentee rates (Branham, 2004). Unsatisfactory environmental learning conditions such as inadequate lighting, ventilation, indoor air quality, or noise control may potentially impact the comfort and health of students, which may adversely affect their academic performance and increase their risk of both short- and long-term health problems (EPA, 2003; Breysse et al., 2010; Rudal & Perovich, 2009).

Reviews of earlier studies found correlations between academic performance and better building quality, newer school buildings, better lighting, and better thermal comfort and air quality (e.g., Schneider, 2002). For example, poor indoor air quality (IAQ) can result in respiratory or other health issues (e.g., allergic reactions) for children and teachers which can affect their performance (EPA 2000; Kennedy 2001, Leach 1997). Most notably, IAQ has been associated with increased student absenteeism (Smedje & Norback, 1999; Rosen & Richardson, 1999; EPA, 2000).

These potential exposures are of particular concern because children generally spend most of their active, awake time at schools and child care facilities. Children are especially sensitive to contamination, for several reasons. First, children are biologically more vulnerable than adults since their bodies are still growing and developing (Faustman et al., 2000). Second, children's intake of air and food is proportionally greater than that of adults. For example, relative to body weight, a child may breathe up to twice as much air as adults do; this increases their sensitivity to indoor air pollutants (EPA, 2008). In particular for younger children, the inhalation and ingestion of contaminated dust is a major route of exposure due to their frequent and extensive contact with floors, carpets, and other surfaces where dust gathers, such as windowsills, as well as their high rate of hand-to-mouth activity (EPA, 2008). Lastly, children have many years of future life in which to develop disease associated with exposure (National Research Council, 1993).

Building upkeep is also extremely important, because the design, construction, and current condition of school and child care center facilities can contribute to children's exposure to environmental contaminants (Braham, 2004; Mendall & Heath, 2005; National Research Council, 2006; Somer et al., 2011; EPA 2011). Age, level of deterioration, and ventilation efficiency are key characteristics that determine a building's indoor environmental quality. Many substances are released into the indoor environment as a result of deterioration of the building from old age, poor maintenance, or through improperly managed removal and renovation processes (National Research Council, 2006; EPA, 1993).

Using data from multiple sources, including FY 2015 OHSMS monitoring reviews and the Head Start Enterprise System, this report will provide information on the age and status of Head Start centers. The report will conclude with a cost estimate to rebuild, renovate, or perform outstanding maintenance and repair of Head Start centers observed in FY 2015 as well as a projection for Head Start centers nationwide.

II. Methodology

The following sections describe the methods used to collect and analyze data to assess Head Start and Early Head Start facilities.

Sources of Facilities Data

This report uses multiple sources of data to evaluate Head Start and Early Head Start facilities:

- Monitoring data from FY 2015 Environmental Health and Safety (EnvHS) review events, which included observations of 5,513 centers
- Self-report data on 3,603 Head Start and Early Head Start centers (e.g., age of the center, recent renovation)
- Grantee administrative and characteristic data collected and archived in the Head Start Enterprise System (HSES)

Monitoring Data from FY 2015 Environmental Health and Safety Review Events

The EnvHS monitoring process uses a rigorous, evidence-based approach to confirm that grantees comply with federal legislative, regulatory, and program requirements related to the safety of Head Start and Early Head Start facilities. The EnvHS Protocol is designed to ensure that all Head Start grantees are implementing and promoting healthy practices and routines, as well as providing safe and supportive environments in which children can learn and grow. The EnvHS Protocol is also used to review the safety of physical environments and Transportation services provided by the program.

The EnvHS Protocol also assessed the quality of Head Start facilities by including items from the Life Safety Codes developed by the National Fire Protection Association.¹ The Life Safety Code is the most widely used source for strategies to protect people based on building construction, protection, and occupancy features that minimize the effects of fire and related hazards, such as means of egress in the case of fire (e.g., panic hardware on exit doors), and operational alert systems and emergency equipment (e.g., smoke detectors and fire extinguishers).² It covers life safety in both new and existing structures.

EnvHS on-site monitoring reviews are conducted by a team of two non-federal consultants with expertise in fire safety and building facility codes, supervised by a Content Area Lead (CAL), and generally take place over a four-day period (review team sizes may vary depending on the size and complexity of the grantee). Once on site, the review team initiates the classroom and center observations.³ The review team observes all center-based classrooms and centers for

¹ Refer to: <http://www.nfpa.org/codes-and-standards/document-information-pages?mode=code&code=101>.

² Observations for Life Safety Codes did not impact OHS's compliance decisions. Life Safety Code data were collected to ascertain the quality of the facilities and inform grantees for continuous quality improvement.

³ The complete EnvHS protocol also includes interviews and bus inspections. However, the data used in this report only include those collected through the classroom and center observations.

the reviewed grantee⁴ using the OHS' Monitoring Protocol to assess grantee compliance with program requirements. Team members complete the observation form, recording any issues regarding the conditions of the centers and classrooms, and take photographs and detailed notes describing the observed issues. Photographs with corresponding text describe issues like cracked walls or foundations, unclean facilities or those in disrepair, and issues with playground equipment.

The EnvHS observation included an initial question about the reviewer's first impressions of the condition, safety and setting. This first impression text box frequently provided valuable information about the surrounding location, setting, environment and overall upkeep of the facility. The remaining observation questions addressed health and safety requirements for facilities, compliance with evacuation requirements, air quality, sanitation, emergency alert systems and fire safety, general safety and wellness, evacuation routes and emergency procedures, Life Safety Code standards, air quality and overall sanitation, and occupancy requirements. Responses to these questions provided data to inform OHS about the safety and cleanliness of grantee facilities.

The EnvHS observation questions also focused on the provision of safe, clean, and appropriate indoor and outdoor learning environments and compliance with the *Head Start Program Performance Standards* (2009) for safe, clean, and appropriate indoor and outdoor learning environments. The questions addressed freedom from dirt and debris, provisions for children with disabilities, space, hazards, age-appropriate toys, furnishings, sleeping arrangements for infants, playground design and equipment, and storage of toxic substances.

Reviewers are required to answer all questions in the protocol. The EnvHS Protocol for the center and classroom observations can be found in Appendix A.

Grantees may receive a finding if a monitoring review indicates that the grantee is not complying with all Performance Standards and requirements of the Head Start Act. Depending on the severity of the issue, the finding may be an Area of Noncompliance (ANC) or a Deficiency. OHS determines, on the basis of the review, whether grantees are compliant, have areas of noncompliance that do not constitute deficiencies, or have deficiencies. Grantees found to have an area of noncompliance or a deficiency receive a Follow-up review to ensure that the finding is corrected. Issues that rise to the level of a "deficiency" include issues that represent threats to the health and safety of children or staff and typically have correction periods that are shorter than those for noncompliances.

Self-Report Data from Grantees about their Centers

As part of the overall information gathering process, grantees reported descriptive information about their centers, including:

⁴ The EnvHS observations also include Family Child Care (FCC) homes and socialization centers for Home-Based programs. However, as this report is focused on center-based facilities, data on those observations are not included here.

- Year the building was constructed
- Square footage of the building (and percent of the building used by the Head Start or Early Head Start)
- Major renovations conducted since the building was constructed
- Any damage to the building's structure caused by severe weather

Data from the Head Start Enterprise System (HSES)

Monitoring data from the EnvHS reviews were supplemented by data from the Head Start Enterprise System (HSES), such as location and ownership of Head Start and Early Head Start centers as reported by the grantees.

Head Start Grantees included in this Report

Head Start and Early Head Start grantees (except for American Indian and Alaska Native grantees) that received an Environmental Health and Safety review event are included in this report. American Indian and Alaska Native grantees are not included as their evaluation is described in a separate report: *Report to Congress on American Indian and Alaska Native Head Start Facilities FY 2015*.

Four-hundred and ninety-nine EnvHS reviews were completed in FY 2015. Monitoring reviews were conducted between November 2014 and June 2015. Exhibit 1 presents the number of grantees, centers, and classrooms observed.

Exhibit 1: Number of Grantees, Centers, and Classrooms observed in FY 2015 EnvHS Reviews

	Reviewed in FY 2015 EnvHS
Grantees	562
Centers	5,513
Classrooms	16,374

III. Results

This section presents basic descriptive data on Head Start and Early Head Start facilities, as well as results of analyses assessing those facilities. These results include:

- ▶ Age of Head Start and Early Head Start facilities
- ▶ Renovations to Head Start and Early Head Start facilities
- ▶ Results of FY 2015 EnvHS reviews and types of issues identified in observed centers and classrooms

Age of Head Start and Early Head Start Facilities

It is important to consider the age of the centers when assessing their conditions as grantees have reported repeated repairs for their older buildings. Data on center construction date was reported for 3,603 centers. Exhibit 2 presents the percentages of centers built in each decade. Over half of the centers were reported to have been built before 1990 with over a third reported to have been built before 1970. The average age of the centers is approximately 40 years old with the oldest center reported as 143 years old.

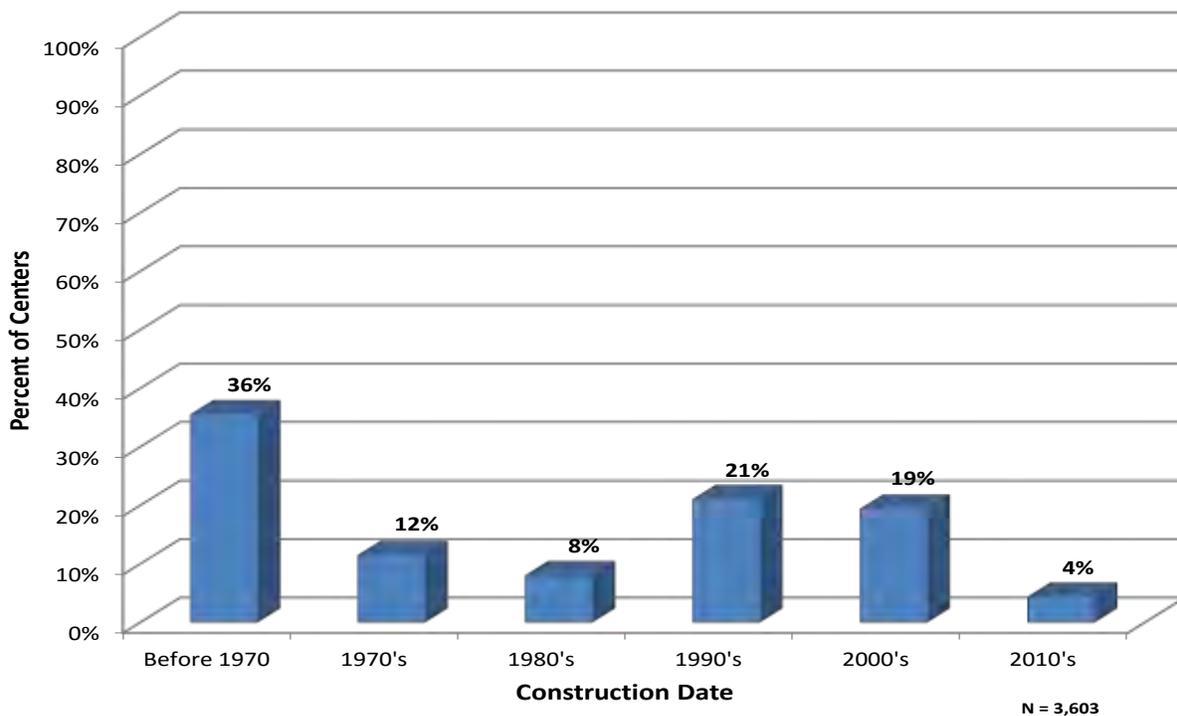
Older buildings need to be inspected for the presence of *lead* and *polychlorinated biphenyls* (PCBs). Lead is a serious environmental health threat for children. Lead-based paint was banned for use in schools in 1978. PCBs are a family of industrial chemicals used primarily as cooling or insulating fluids for electrical equipment or as additives to paints, plastics, and rubber products. While the manufacture of PCBs was banned in 1979, PCBs continue to be present in products and materials produced before the ban. 1,667 Head Start centers (46 percent) were constructed before 1979.

Report on Unclean Bathrooms in an Older Head Start Center

The boys' restroom had a strong urine smell, and the area around the toilet was wet and dirty... The Center Director stated the teachers cleaned the restrooms daily; however, the building was old, and it was difficult to get rid of the odor.

Excerpt from EnvHS grantee report

Exhibit 2: Percent of Centers Built by Decade



Of the 3,603 centers; 1,000 centers (28 percent) have had a major renovation since its construction (Exhibit 3). Note that only 46 percent of the oldest centers have been renovated. Moreover, of the 2,745 centers built before 2000, only 902 (or 33 percent) have been renovated. Exhibit 4 summarizes the types of renovations reported.⁵

Exhibit 3: Percent of Centers Renovated by Decade of Construction Date

Construction Date	Number of Centers Renovated	Percent of Centers Renovated	Total Centers
Before 1970	591	46%	1,281
1970's	119	29%	415
1980's	81	28%	290
1990's	111	15%	759
2000's	83	12%	700
2010's	15	9%	158
Total	1,000	28%	3,603

⁵ Note that many Head Start centers have had multiple types of renovations.

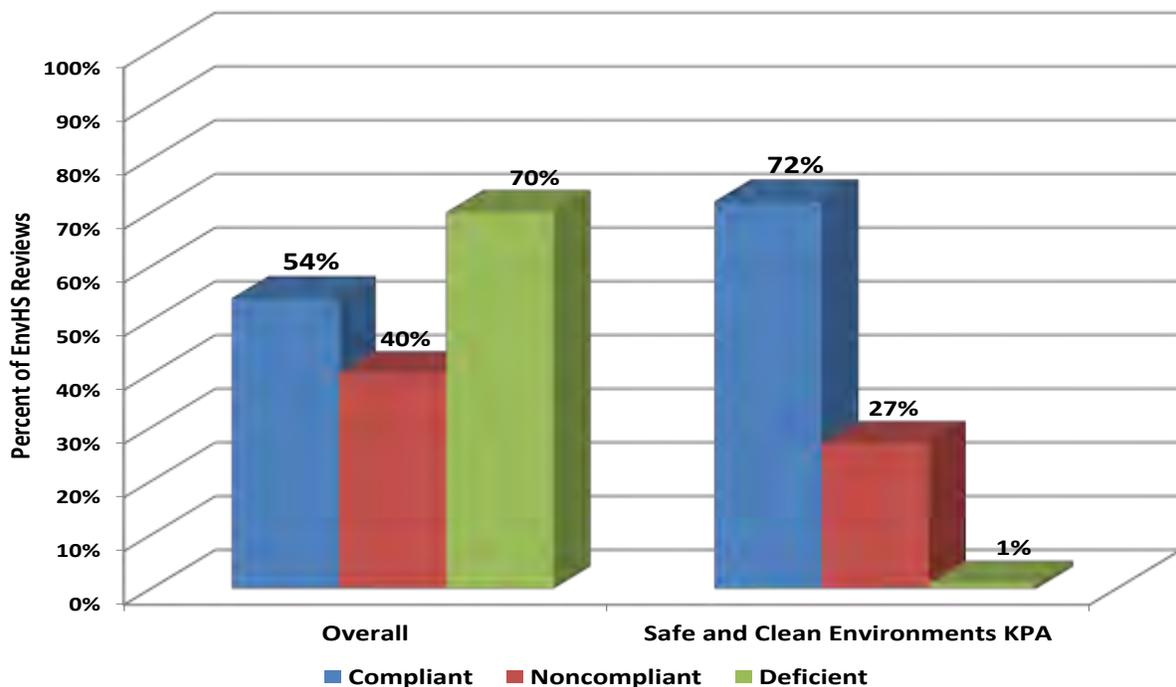
Exhibit 4: Summary of Renovations Conducted in Head Start and Early Head Start Centers

Description of Renovation	Number of Centers
General Interior Improvements – painting, carpeting	133
Interior renovation – New kitchen, bathroom(s), office, classrooms	364
Infrastructure Improvements – walls, ceiling, flooring	145
Electric and Plumbing Upgrades/Improvements	161
Exterior Building additions/renovations	503
Improvements to playground/outdoor areas	102

Results of FY 2015 EnvHS Monitoring Reviews

As mentioned in chapter II, over 16,000 classrooms from 5,500 centers were observed for environmental health and safety monitoring in FY 2015. The EnvHS Protocol for the *Safe and Clean Environments* KPA can be found in Appendix A. Grantees may receive a finding if data collected during the EnvHS review indicates that the grantee is not complying with all Performance Standards and requirements of the Head Start Act. Depending on the severity of the issue, the finding may be an Area of Noncompliance (ANC) or a Deficiency. Over a quarter (28 percent) of the reviewed grantees had a finding in the *Safe and Clean Environments* KPA (exhibit 5).

Exhibit 5: FY 2015 EnvHS Review Outcomes: Overall and for *Safe and Clean Environments* Key Performance Area (KPA)



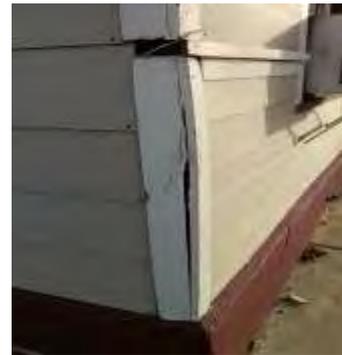
For this report, *Safe and Clean Environments* findings identified in those EnvHS observations were categorized into three areas:

- ▶ Poorly-Maintained or Unclean Environments
- ▶ Lack of Preparedness for Fire and Other Emergencies
- ▶ Other Potential Safety Hazards

Poorly-Maintained or Unclean Environments

Exhibit 6 summarizes the top concerns observed. Examples of issues of “poorly-maintained or unclean environments” include:

- ▶ *Structural issues* –holes, cracks and water damage in the foundations and walls of buildings, ceilings, and sidewalks. In many cases, structural openings could lead to dusty and dirty classrooms and provide entrance for pests and rodents.
- ▶ *Poor ventilation or old/outdated heating, ventilation, air-conditioning (HVAC) units* – many HVAC units had rust, dust and dirt potentially leading to poor air quality in the classrooms. In addition, some units were in disrepair, with exposed sharp edges, and missing covers.
- ▶ *Worn or unclean interiors* – poor overall conditions included cracked walls; evidence of water damage, leaks, and mold; and peeling paint.
- ▶ *Worn or unclean bathrooms* –bathrooms, in particular were observed to be in poor conditions. These included cracked walls; evidence of water damage, leaks, rust and mold. These also included inappropriately-sized toilets and sinks, missing tiles, unsuitable bathroom doors, missing toilet tank covers, and detached sinks.
- ▶ *Unsafe playgrounds and unsuitable outdoor equipment/structures* – lack of suitable shock absorbent surfacing underneath climbing structures and playground equipment, playground equipment were in disrepair, or had begun to rust and had loose or unstable pieces that could injure children playing on the equipment.
- ▶ *Worn, broken, or unstable furnishings* – these included worn or damaged furnishings that could injure children using them. These also included unstable or unsecure storage bins and shelves in well-traveled areas of the room that could easily be knocked over and fall on children or staff



Examples of Structural Issues in Head Start Centers



Example of Damaged Ceilings due to Extensive Water Leaks in Head Start Classroom



Example of Extensively Damaged Entrance to Head Start Center

Exhibit 6: Issues regarding Poorly-Maintained and Unclean Environments

Concern	Number of Concerns Observed in Centers	Number of Concerns Observed in Classrooms
Facilities, materials, or equipment have hazards that may cause harm to children, families, or staff.	495	
The environment is not free of air pollutants, including mold, smoke, lead, pesticides, and herbicides, as well as soil and water pollutants.	117	
Toilets and handwashing facilities are not clean, adequate in number, in good repair, and easily accessible to children.	92	92
The program has not addressed identified issues from the most recent safety inspection.	92	92
Toileting and diapering areas are not separated from areas used for cooking, eating, and children’s activities.		37



Example of Mold on Window Sill in Head Start Classroom



Example of Peeling Lead Paint in Head Start Center

Lack of Preparedness for Fire and Other Emergencies

Exhibit 7 summarizes the top concerns observed. Many of the issues in this category align with the Life Safety Codes. Issues observed in Head Start and Early Head Start Centers cite inadequate means of egress in the case of fire (e.g., no direct exits to the outside; no panic hardware on exit doors) and insufficient alert systems (e.g., no/insufficient fire alarm systems; no smoke detectors) and insufficient emergency equipment (e.g., no sprinkler systems, no fire extinguishers, no emergency lighting). These issues expose Head Start children and staff to significant risk if there were a fire or other emergency requiring immediate evacuation of the center.

Exhibit 7: Observed Issues Regarding Lack of Preparedness for Fire and Other Emergencies

Concern	Number of Concerns Observed in Centers	Number of Concerns Observed in Classrooms
Inadequate means of egress from building	761	2,014
Insufficient emergency equipment	256	
Inadequate emergency alert systems	1,126	229

Other Potential Safety Hazards

Other safety hazards not described above were also observed (exhibit 8). These included significant classroom infrastructure issues that increase the risk of injury to children, such as inappropriately designed heating and cooling systems and windows that were accessible to children to climb out.

Exhibit 8: Safety and Injury Prevention Issues

Concern	Number of Concerns Observed in Centers	Number of Concerns Observed in Classrooms
The heating-and-cooling system is not designed to prevent injury to children and adults.		87

III. Results

Windows and glass doors are not constructed, secured, and adjusted to prevent children's injury and escape.

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V. Conclusions

Data on Head Start centers observed in Fiscal Year (FY) 2015 monitoring reviews indicate that many Head Start centers are older buildings. Over half of the centers were reported to have been built before 1990 with over a third reported to have been built before 1970. Less than half of the monitored centers built before 1970 have been renovated. The average age of the centers is approximately 40 years old with the oldest center reported as 176 years old.

Some observed buildings have issues that are expected in older buildings, such as poorly maintained or unclean environments and safety code issues (e.g., fire safety). Age and weather pose challenges, including weatherization, deterioration, structural defects, and maintenance of playground safety. Due to the age of the centers and the fact that exposure to weather compounds problems, it is expected that the conditions will worsen over time. These potential exposures are of particular concern because children are especially sensitive to contamination, for several reasons (Faustman et al., 2000; EPA, 2008; National Research Council, 1993).

Cost Estimates

Of the centers observed in FY 2015, 2,201 centers were identified as needing improvement. The total cost estimated to rebuild, renovate, or perform outstanding maintenance and repair of these 2,201 centers is estimated to be **\$1,075,636,203**. The average cost to rebuild, renovate, and repair these centers is \$488,703 per center. Note that this total does not include an estimate for the cost to repair, renovate or rebuild facilities that did not receive a FY 2015 EnvHS review. As this estimate is based on the data gathered through monitoring reviews, a more thorough assessment of the conditions of all centers for the purposes of cost estimation would yield a more precise determination of the exact costs needed to improve these facilities. OHS will ensure that any centers approved for major renovations or rebuilding make good use of space to create the best learning environments for children.

Methodology for Estimating Costs

RSMeans data⁶, estimates that it would cost \$194.57 per square foot as a U.S. National Average cost to rebuild an entirely new day care center. OHS relied on RSMeans data in part to calculate estimates in Appendix D.

The RSMeans estimate of \$197.57 per square foot is based on a building model that assumes basic components and uses union labor for a 10,000 square foot day care center as the standard.

The square foot estimate is calculated by RSMeans in the following manner:

⁶ The 2013 RSMeans cost data was used for the National Average costs. RSMeans develops construction cost data and is updated throughout the year for more than 900 cities in the US and Canada. The data is used for construction budgeting and estimating for both new building and renovation projects.

- Estimating \$142.80 per square foot for materials
- Adding 25 percent to cover the cost of contractor fees
- Adding 9 percent for architectural fees using U.S. National Average costs as estimates⁷

OHS has developed a final estimate of \$ 252.94 per square foot for rebuilding a Head Start center. This figure includes an additional 30 percent to the 194.57 cost per square foot estimate. The additional 30 percent includes an amount for paying Davis Bacon Wages⁸ for work performed, addresses the cost of special HS/EHS requirements related to complying with the *Program Performance Standards*, and includes an adjustment for the high cost of construction in remote areas. OHS' rebuilding and renovation efforts with Hurricane Sandy helped inform this estimate.

Considerations

OHS took into consideration the square footage of the existing center when estimating the costs for each center using measures provided during the 2015 assessment. Where center square footage was not ascertained, the square footage was estimated using the number of children receiving services at 35 square feet per child. (According to section 1304.53(a)(5) of the Head Start Program Performance Standards, centers must have at least 35 square feet of usable indoor space per child available for the care and use of children.). In addition, the condition of the center was considered when determining the cost to rebuild, renovate, or perform outstanding maintenance and repair. For example, centers that had environmental health and safety issues as identified in KPA 1 of the EnvHS review were included. Centers that needed improvements related to Life Safety Codes were also included.⁹

However, centers that either had been built or renovated in the past 15 years as they are newer buildings or had been recently renovated were excluded. Fifty percent of the centers assessed are 40 years of age or older. It is important to consider that some centers may have systemic problems requiring major renovations and a few may require rebuilding. Older centers were more likely to have problems that would be more costly to correct than newer buildings, such as leaky roofs, old boilers, and structural issues. Due to the age of centers and the fact that some problems are compounded by exposure to severe weather, it is expected that conditions will worsen over time. Additional funding for overdue maintenance, renovation, and some new construction would support grantees in maintaining centers suitable for providing Head Start services to the communities they serve.

⁷ Ibid.

⁸ The Davis-Bacon and Related Acts, apply to contractors and subcontractors performing on federally funded or assisted contracts in excess of \$2,000 for the construction, alteration, or repair (including painting and decorating) of public buildings or public works. Davis-Bacon Act and Related Act contractors and subcontractors must pay their laborers and mechanics employed under the contract no less than the locally prevailing wages and fringe benefits for corresponding work on similar projects in the area.

⁹ Note that the EnvHS protocol assesses the health and safety of Head Start and Early Head Start facilities based on the requirements of the *Head Start Program Performance Standards* and may not account for all factors relevant to calculating a cost estimate for rebuilding or renovating a facility.

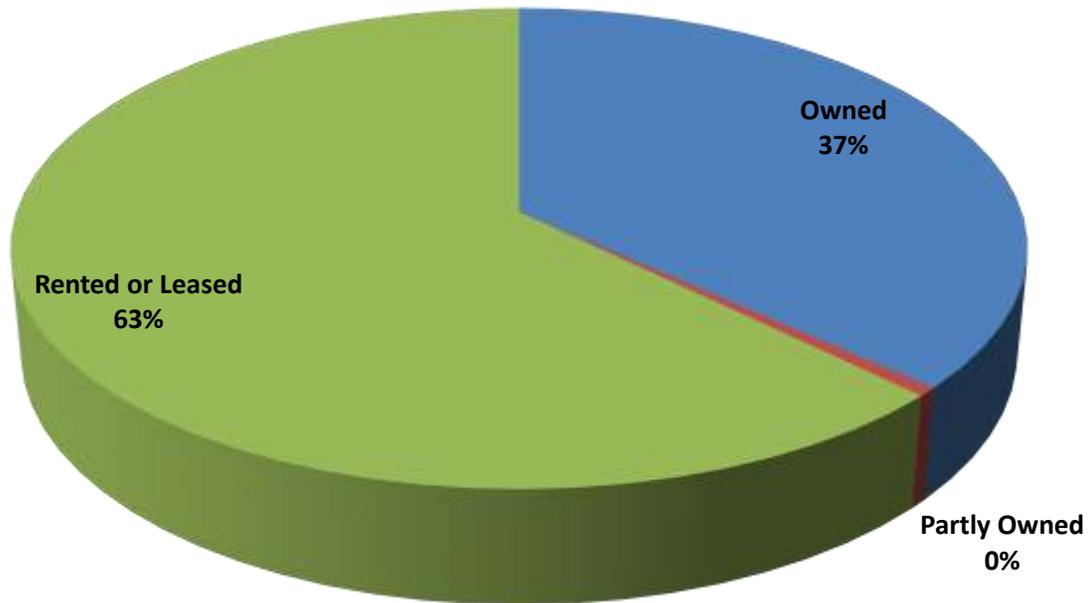
Note that the above estimate does not include a projection for the cost to repair, renovate or rebuild facilities across the nation that did not receive a FY 2015 EnvHS review. OHS used available monitoring data from FY 2015, such as percentage of observed centers built in the past 15 years and percentage of observed centers with EnvHS issues, in order to project how many centers would need to be rebuilt, renovated, or undergo outstanding maintenance and repair and have a better understanding of the magnitude of the issue. Based on these factors, OHS projects that 7,857 centers will need to be rebuilt, renovated, or undergo outstanding maintenance and repair at a cost of \$3,839,941,250 (average cost per center = \$488,703). It should be noted that monitoring data (including observations and square footage data) was collected on only about one-quarter of the total number of centers in Head Start.¹⁰ These estimates also assume that the centers observed in FY 2015 are representative of the entire population of Head Start and Early Head Start centers in terms of characteristics such as age, size, and condition. A more thorough assessment of the conditions of all centers will yield a more precise determination of the exact costs needed to improve these facilities.

Ownership of Head Start and Early Head Start Facilities

In FY 2015, 37 percent of Head Start centers were owned by the grantee (Exhibit 10). Sixty-three percent had other arrangements, such rent or leasing agreements or in-kind donation of the space. Less than 1 percent of centers owned part of the center and leased part of the center (e.g., portable or modular units).

¹⁰ The collection of observation data on the remaining population of Head Start centers will continue in FY 2017. We anticipate completing the remaining observations by the end of FY 2017 to further refine the cost estimates in this report.

Exhibit 9: Percent of Centers Owned or Rented/Leased by Grantee



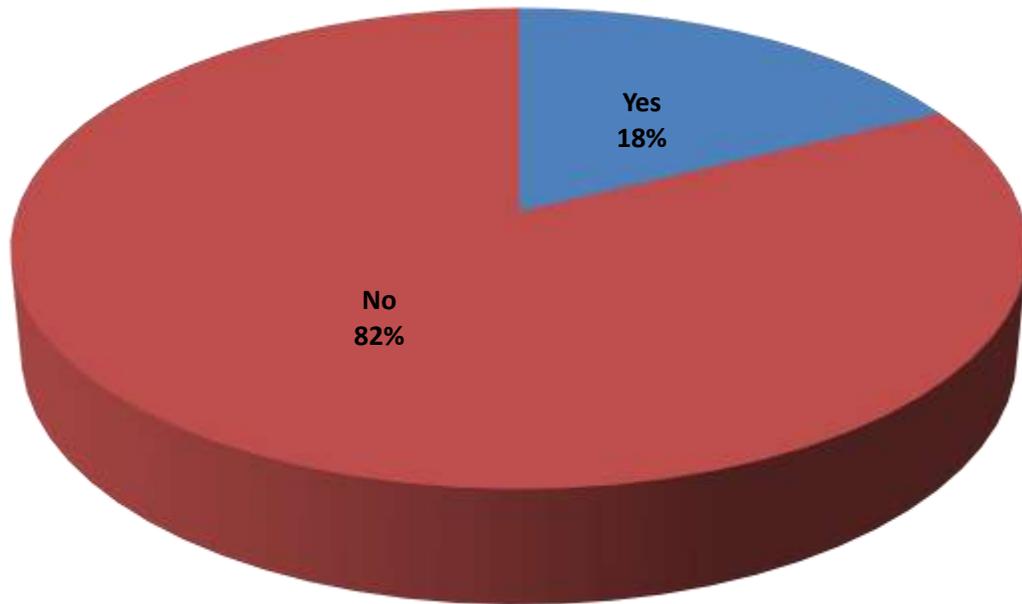
Federal Interest

Based on data from the Head Start Enterprise System (HSES), 18 percent (or 3,864) of 21,942 Head Start centers¹¹ have federal interest (Exhibit 11). Under 45 CFR 1309.21 there must be a Notice of Federal Interest whenever grant funds are used to purchase, construct or make major renovations to a facility. The 2015 assessment collected information on federal interest as reported below in Figure 4. The requirements of 45 CFR Part 1309 cover all arrangements through which a grantee uses Head Start funds to purchase, construct or make major renovations to a facility. A lease/purchase agreement, also referred to as a capital lease or a lease with a bargain purchase option, is considered the equivalent of a purchase.¹² Renovations to properties that are leased with federal funds require federal approval due to federal interest.

¹¹ This calculation excludes centers from American-Indian/Alaska Native grantees.

¹² This information is from the OHS Program Instruction issued on December 8, 2009: ACF-PI-HS-09-10.

Exhibit 10: Percent of Centers with a Federal Interest



N = 21,942

Future implications

School facilities affect learning. Spatial configurations, noise, heat, cold, light, and air quality obviously bear on children’s and teachers’ ability to perform. Clean air, good light, and a quiet, comfortable, and safe learning environment are needed for children to perform at their best. Head Start centers must be in compliance with the Program Performance Standards, local building codes, and, where applicable, state and local licenses. To remain in compliance, the centers must ensure the health and safety of children, staff, and visitors. In addition, the center buildings and surrounding areas must be clean and without hazards that threaten occupants and visitors.

While many Head Start facilities provide such environments for their children, many others require major renovations, and a few centers may require new construction rather than renovation. The estimated cost nationwide to renovate, maintain, rebuild or repair the centers is approximately \$3.8 billion.

Available Resources to Support Grantees

Head Start makes resources available to grantees to support their efforts to create safe and healthy physical environments that are conducive to learning and adapted to the stages of

children's development.

The Early Childhood Learning and Knowledge Center (ECLKC) (<http://eclkc.ohs.acf.hhs.gov/hslc>) offers online support to grantees considering construction projects including advice about design, documentation, bidding, negotiation, and construction administration. In addition, technical guides about design, information about renting or leasing facilities, resources for safe playgrounds, and tip sheets about facilities assessments and other aspects of facilities management are available through this site.

OHS also supports a National Center devoted to Program Management and Fiscal Operations (NCPMFO) operated through a new cooperative agreement awarded in 2015 as part of its Training and Technical Assistance (TTA) system. NCPMFO disseminates clear, consistent messages on OHS priorities for the development and implementation of sound management systems and strong internal controls. NCPMFO is retaining a facility consultant who will be available to grantees and will create and post materials regarding facilities on the ECLKC. In addition, the Regional TTA staff are available to address grantees' facility issues in partnership with the Regional Offices' expert facility staff.

Appendix A: FY 2015 Environmental Health and Safety Protocol

The EnvHS Protocol is used to evaluate Head Start and Early Head Start (EHS) centers and classrooms, as well as Family Child Care (FCC) homes that provide services to children. The OHS uses the information about grantee performance gathered during monitoring reviews to evaluate multiple levels of performance, including determining program strengths, concerns, areas of noncompliance, and deficiencies.

The EnvHS Protocol focuses on four areas of performance, referred to as Key Performance Areas (KPA). However, one KPA (*Safe & Clean Environments*) focuses on the safety and cleanliness of the physical environment and is relevant to this report.¹³

Safe and Clean Environments

The *Safe and Clean Environments* KPA contains three Compliance Measures (CMs). CMs are specific statements that collectively assess the level of program performance for the KPA. Each CM focuses on one or more Federal regulations and the development of strong systems to deliver quality services to children and families. For the *Safe and Clean Environments* KPA, the three CMs are presented in the protocol.

Onsite Activities

EnvHS on-site monitoring reviews are conducted by a team of two non-federal consultants with expertise in fire safety and building facility codes, supervised by a Content Area Lead (CAL), and generally take place over a four-day period. Review team sizes vary depending on the size and complexity of the grantee. For example, larger grantees, including those with delegate agencies and those with complex program designs (e.g., grantees with both Head Start and Early Head Start programs) may require more reviewers. The very largest grantees, considered “super grantees,” require both substantially larger review teams and longer review periods.

Once on site, the review team initiates the information collection process which, for the *Safe & Clean Environments* KPA, is the observations.¹⁴ The review team observes all center-based classrooms and centers for the reviewed grantee¹⁵ using the OHS’ Monitoring Protocol to assess grantee compliance with program requirements. Team members complete the observation form, recording any issues regarding the conditions of the centers and classrooms, and take photographs and detailed notes describing the observed issues. Photographs with

¹³ The other KPAs are *Safe & Sanitary Practices* (The program establishes and maintains healthy practices and routines), *Staffing & Supervision* (The program implements hiring practices, learning environments, and supervision practices that ensure the safe supervision of all children at all times), and *Safe Transportation* (The program ensures children’s safety by providing safe vehicles and effective training to supervisory staff). Please see the EnvHS protocol posted on ECLKC (<http://eclkc.ohs.acf.hhs.gov/hslc/grants/monitoring/docs/fy2016-EnvHS.pdf>) for the complete EnvHS protocol.

¹⁴ The complete EnvHS protocol also includes interviews and bus inspections. However, the data collection procedures for the *Safe & Clean Environments* KPA only include observations.

¹⁵ The EnvHS observations also include Family Child Care (FCC) homes and socialization centers for Home-Based programs. However, as this report is focused on center-based facilities, data on those observations are not included here.

corresponding text describe issues like cracked walls or foundations, unclean facilities or those in disrepair, and issues with playground equipment.

Team members share information on a routine basis through the Office of Head Start Monitoring System (OHSMS) software application, team meetings, email, and telephone communications throughout the day. The CAL also facilitates nightly team meetings to discuss and document preliminary findings and to identify areas requiring further exploration. The on-site review culminates in the development of a preliminary report of findings that is submitted to OHS. OHS makes final determinations on the grantee's compliance and notifies grantees of any areas that require correction.



Administration for Children and Families
U.S. Department of Health and Human Services



FY 2016 Office of Head Start Environmental Health & Safety Monitoring Protocol



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FY 2016 OHS ENVIRONMENTAL HEALTH & SAFETY PROTOCOL: OVERVIEW

Overview

The Office of Head Start (the OHS) presents the **FY 2016 Environmental Health & Safety (EnvHS) Protocol**. This instrument is used to gather information to assess grantee performance in ensuring safe and healthy environments for children, families, and staff. The EnvHS Protocol is used to assess Head Start and Early Head Start (EHS) centers and classrooms, as well as Family Child Care (FCC) homes used to provide services to children. The Protocol will also be used in centers that provide socialization experiences for children receiving services through home-based and locally designed programs. The OHS uses the information about grantee performance gathered during monitoring reviews to evaluate multiple levels of performance, including determining program strengths, concerns, areas of noncompliance, and deficiencies.

The EnvHS Protocol is designed to ensure that all Head Start programs are implementing and promoting healthy practices and routines, as well as providing safe and supportive environments in which children can learn and grow. The EnvHS Protocol is also used to review the safety of physical environments and Transportation services provided by the program. By monitoring environmental health and safety, the OHS strives to ensure that Head Start programs are supporting children's health and development by providing safe learning environments.

Organization of the Protocol

Key Performance Areas (KPA's)

The EnvHS Protocol focuses on four areas of performance, referred to as Key Performance Areas (KPA's). The OHS assesses performance across specific measures within each KPA. KPA's provide the organizational framework for assessing grantee performance in each of the following areas:

- 1) **Safe & Clean Environments.** The program ensures physical environments are safe and clean for children, parents, and staff.
- 2) **Safe & Sanitary Practices.** The program establishes and maintains healthy practices and routines.
- 3) **Staffing & Supervision.** The program implements hiring practices, learning environments, and supervision practices that ensure the safe supervision of all children at all times.
- 4) **Safe Transportation.** The program ensures children's safety by providing safe vehicles and effective training to supervisory staff.

Compliance Measures (CMs)

Each KPA contains a series of Compliance Measures (CMs). CMs are specific statements that collectively assess the level of program performance for each KPA. Each CM focuses on one or more Federal regulations and the development of strong systems to deliver quality services to children and families.

Targeted Questions (TQs)

Targeted Questions (TQs) for each CM are designed to provide guidance to on-site Reviewers and ensure a standardized method for evidence collection. TQs indicate the people to interview, questions to ask, information to retrieve from documents, and observations to conduct. Reviewers are required to answer all TQs for each CM.

Environmental Health & Safety

Environmental Health & Safety Key Performance Area #1: Safe and Clean Environments

	<i>Compliance Measures</i>	<i>Federal Regulation</i>
1.1	<p>The program provides safe, healthy, and clean environments by ensuring:</p> <ul style="list-style-type: none"> • Safety inspections are conducted regularly • Children are not exposed to environmental toxins or pollutants • Environments are clean and sanitary • Materials, equipment, and facilities are age-appropriate and accessible to children • Facilities are well maintained and in good repair • Environments are free from hazards and are designed to prevent injury or harm to children 	<p>1304.53(a)(5)</p> <p>1304.53(a)(7)</p> <p>1304.53(a)(8)</p> <p>1304.53(a)(10)</p> <p>1304.53(a)(10)(i)</p> <p>1304.53(a)(10)(iii)</p> <p>1304.53(a)(10)(vi)</p> <p>1304.53(a)(10)(viii)</p> <p>1304.53(a)(10)(x)</p> <p>1304.53(a)(10)(xi)</p> <p>1304.53(a)(10)(xii)</p> <p>1304.53(a)(10)(xv)</p> <p>1304.53(a)(10)(xvi)</p> <p>1304.53(b)(1)(iii)</p> <p>1304.53(b)(3)</p> <p>1306.35(b)(2)(v)</p> <p>1306.35(b)(2)(vii)</p> <p>1306.35(b)(2)(viii)</p> <p>1306.35(b)(2)(ix)</p>
1.2	<p>The program ensures facilities are prepared for and equipped to prevent emergencies.</p>	<p>1304.22(a)(1)</p> <p>1304.22(a)(3)</p> <p>1304.53(a)(10)(v)</p> <p>1304.53(a)(10)(vi)</p> <p>1304.53(a)(10)(vii)</p> <p>1306.35(b)(1)</p>

		1306.35(b)(2)(ii) 1306.35(b)(2)(iii)
1.3	All facilities comply with State and local licensing requirements including, but not limited to, child care licensing, fire and building inspections, and occupancy permits. <i>Targeted Questions related to Life Safety Codes are used to collect data to inform the Office of Head Start of the quality of safety in grantee facilities.</i>	1306.30(c) 1306.35(d)

Targeted Questions

Environmental Scan

Environmental Scan—EnvHS 1.1

- ▶ Please document notes based on your first impressions of the setting you are observing.

Center Observations

Inspections—EnvHS 1.1

- ▶ Does the grantee conduct safety inspections of all facilities, including all indoor and outdoor learning environments?
- ▶ Review the results of the most current safety inspection for the setting you are observing. Are there any issues that are yet to be addressed?
- ▶ How do staff address issues identified during safety inspections?
- ▶ How often does the grantee perform safety inspections?
 - Monthly
 - Semi-annually
 - Annually
 - Less frequently than annually

Air Quality and Toxins - EnvHS 1.1

- ▶ Is the environment free of air pollutants and toxins, including:
 - Mold
 - Lead
 - Pesticides
 - Asbestos
 - Herbicides
 - Other

Cleanliness and Sanitation—EnvHS 1.1

- ▶ Are toilets and handwashing facilities clean?

Center Observations (continued)

Age-Appropriateness and Accessibility—EnvHS 1.1

- ▶ Are toilets and handwashing facilities adequate in number and easily accessible by children?
- ▶ Does the design of the playground and equipment promote the safety of children, including:
 - Appropriate height and accessibility?

Facility Maintenance and Repair - EnvHS 1.1

- ▶ Do toilets and handwashing facilities need repair?
- ▶ Does the design of the playground and equipment promote the safety of children, including:
 - Equipment on shock-absorbing surface?
 - Equipment is stable and/or secured to the ground?

Safety Hazards- EnvHS 1.1

- ▶ Are facilities, materials, and equipment free of hazards that may cause harm to children, families, or staff?
- ▶ Do children have access to heating elements that could cause burns?
- ▶ Does the design of the playground and equipment promote the safety of children, including:
 - No openings that could entrap a child's head or limbs?
 - Absence of sharp edges, rust, choking and/or strangulation hazards, garbage, and hazardous materials (e.g., glass, needles, animal feces)?
- ▶ Are toxic substances inaccessible to children?

Emergency Prevention and Preparedness—EnvHS 1.2

- ▶ Is a fire extinguisher available?
- ▶ Is the extinguisher easily accessible?
- ▶ Is there a service date on the fire extinguisher showing it has been updated at least annually?
- ▶ Is there a smoke-detector system?
- ▶ Is emergency lighting available to allow children and adults to clearly see pathways in case of a power failure?

Center Observations (continued)

Licensing—EnvHS 1.3

- ▶ Does the program have a current child care license for this center?

Life Safety Codes & Occupancy Requirements—EnvHS 1.3

- ▶ Does the program have a current child care license for this center?
- ▶ Does the building have an occupancy permit?
- ▶ Does the grantee ensure that occupancy loads for assembly spaces are calculated and posted?
- ▶ Does the center have an occupancy load of more than 50 persons?
- ▶ Does the center have an occupancy load of more than 100 persons?
- ▶ Does the building have an automatic fire-sprinkler system?
- ▶ Do children or staff occupy the basement level of the building?
- ▶ Is there a fire-alarm system that includes all of the following?
 - Manual means of initiation (e.g., pull boxes)
 - Connection to the smoke-detector system
 - Use of both audio and visual signals when activated
- ▶ Was the fire-alarm system tested within the last 12 months?
- ▶ Are ceilings a minimum of 7 feet, 6 inches, with no projections protruding to provide less than 6 feet, 8 inches?
- ▶ Are all doors used for entry and exit between 32 and 48 inches wide?
- ▶ Are all corridors that lead to an exit a minimum of 36 inches wide?
- ▶ Is every exit door equipped with panic hardware?
- ▶ Do any exit doors have more than one locking or latching device?
- ▶ Does each floor of the center have a minimum of two exits that lead to the outside?
- ▶ Does the center have any dead-end corridors that exceed 20 feet in length?
- ▶ Does the center have any dead-end corridors that exceed 50 feet in length?
- ▶ Are all stairways a minimum of 44 inches wide? (Applies only to buildings with more than 50 occupants.)
- ▶ Are all stairways a minimum of 36 inches wide? (Applies only to buildings with fewer than 50 occupants.)

Classroom Observations

Air Quality and Toxins EnvHS 1.1

- ▶ Is the environment free of air pollutants and toxins, including:
 - Mold
 - Lead
 - Pesticides
 - Asbestos
 - Herbicides
 - Other

Cleanliness and Sanitation EnvHS 1.1

- ▶ Are the following areas clean and free of dirt and debris?
 - Carpets
 - Floors
 - Furniture
 - Toys
 - Materials
 - Counters and shelves
 - Sinks
 - Bathrooms

Cleanliness and Sanitation—EnvHS 1.1 (continued)

- ▶ Are garbage and trash stored in a safe and sanitary manner that does not allow easy access by children?
- ▶ Is there evidence of pests?

Age-Appropriateness and Accessibility – EnvHS 1.1

- ▶ Are toilets and handwashing facilities adequate in number and easily accessible by children?
- ▶ Were provisions made to ensure the safety, comfort, and participation of children with disabilities?
- ▶ Does the classroom provide at least 35 square feet of usable indoor space per child (excluding bathrooms, halls, kitchens, staff rooms, and storage space)?
- ▶ Are toys, materials, and furniture age-appropriate?
- ▶ Does the program ensure that sleeping arrangements for infants (e.g., cribs, playpens, bassinets) are free of soft bedding materials (e.g., soft mattresses, pillows, stuffed animals, fluffy blankets, comforters)? (Applies only to programs serving infants and toddlers.)

Classroom Observations (continued)

Facility Maintenance and Repair—EnvHS 1.1

- ▶ Are windows and glass doors constructed, secured, and adjusted to prevent children's injury and escape?
- ▶ Do toilets and handwashing facilities need repair?
- ▶ Is there broken furniture that presents a risk of injury to children or adults?

Safety Hazards—EnvHS 1.1

- ▶ Are facilities, materials, and equipment free of hazards that may cause harm to children, families, or staff?
- ▶ Do children have access to heating elements that could cause burns?
- ▶ Are electrical outlets accessible to children designed to prevent shock through the use of covers, installation of child-protection outlets (e.g., tamper-resistant outlets), or use of safety plugs?
- ▶ Are toxic substances accessible to children?

Emergency Prevention and Preparedness—EnvHS 1.2

- ▶ Are exits clearly marked?
- ▶ Is an evacuation route posted?
- ▶ Are emergency procedures posted?
- ▶ Is there a smoke-detector system?
- ▶ Was the smoke-detector system tested within the last 12 months?

Life Safety Code Requirements—EnvHS 1.3

- ▶ Are all classroom doors within 100 feet of the nearest exit?
- ▶ Are all classroom doors within 50 feet of any point in the classroom?
- ▶ Does the classroom have an exit that leads directly to the outside?
- ▶ Does the classroom have at least one outside window for emergency rescue or ventilation?
- ▶ Are Exit signs illuminated?

Family Child Care (FCC) Observations

Inspections—EnvHS 1.1

- ▶ Does the grantee conduct safety inspections of all facilities, including all indoor and outdoor learning environments?
- ▶ Review the results of the most current safety inspection for the setting you are observing. Are there any issues that are yet to be addressed?
- ▶ How do staff address issues identified during safety inspections?
- ▶ How often does the grantee perform safety inspections?
 - Monthly
 - Semi-annually
 - Annually
 - Less frequently than annually

Air Quality and Toxins—EnvHS 1.1

- ▶ Is the environment free of air pollutants and toxins, including:
 - Mold
 - Lead
 - Pesticides
 - Asbestos
 - Herbicides
 - Other

Cleanliness and Sanitation—EnvHS 1.1

- ▶ Are garbage and trash stored in a safe and sanitary manner that does not allow easy access by children?
- ▶ Are the following areas clean and free of dirt and debris?
 - Carpets
 - Floors
 - Furniture
 - Toys
 - Materials
 - Counters and shelves
 - Sinks
 - Bathrooms
- ▶ Is there evidence of pests?

Family Child Care (FCC) Observations (continued)

Age-Appropriateness and Accessibility—EnvHS 1.1

- ▶ Are toilets and handwashing facilities adequate in number and easily accessible by children?
- ▶ Were provisions made to ensure the safety, comfort, and participation of children with disabilities?
- ▶ Does the Family Child Care home have sufficient indoor and outdoor space that is usable by and available to children?
- ▶ Are toys, materials, and furniture age-appropriate?
- ▶ Does the program ensure that sleeping arrangements for infants (e.g., cribs, playpens, bassinets) are free of soft bedding materials (e.g., soft mattresses, pillows, stuffed animals, fluffy blankets, comforters)? (*Applies only to programs serving infants and toddlers.*)
- ▶ Does the design of the playground and equipment promote the safety of children, including:
 - Appropriate height and accessibility?

Facility Maintenance and Repair—EnvHS 1.1

- ▶ Are windows and glass doors constructed, secured, and adjusted to prevent children's injury and escape?
- ▶ Do toilets and handwashing need repair?
- ▶ Is there broken furniture that presents a risk of injury to children or adults?
- ▶ Does the design of the playground and equipment promote the safety of children, including:
 - Equipment on shock-absorbing surfaces?
 - Equipment is stable and/or secured to the ground?

Family Child Care (FCC) Observations (continued)

Safety Hazards—EnvHS 1.1

- ▶ Are facilities, materials, and equipment free of hazards that may cause harm to children, families, or staff?
- ▶ Do children have access to heating elements that could cause burns?
- ▶ Are electrical outlets accessible to children designed to prevent shock through the use of covers, installation of child-protection outlets (e.g., tamper-resistant outlets), or use of safety plugs?
- ▶ Are children safe from potential hazards posed by appliances (stove, refrigerator, microwave, etc.), such as appliances with frayed wires, hot stoves, and refrigerator coils?
- ▶ Are firearms and other weapons secured in areas not occupied by children?
- ▶ Does the provider ensure that alcohol and drugs are not consumed while children are present?
- ▶ Does the provider ensure that alcohol and drugs are inaccessible to children at all times?
- ▶ Are current health certificates available for pets documenting up-to-date immunizations, and are pets free from conditions that may pose a health threat?
- ▶ Does the provider ensure the safety of children at all times when pets are present?
- ▶ Does the design of the playground and equipment promote the safety of children, including:
 - No openings that could entrap a child's head or limbs?
 - Absence of sharp edges, rust, choking and/or strangulation hazards, garbage, and hazardous materials (e.g., glass, needles, animal feces)?
- ▶ Are toxic substances inaccessible to children?

Family Child Care (FCC) Observations (continued)

Emergency Prevention and Preparedness—EnvHS 1.2

- ▶ Are exits clearly marked?
- ▶ Is an evacuation route posted?
- ▶ Are emergency procedures posted in this setting?
- ▶ Is there a smoke-detector system?
- ▶ Was the smoke-detector system tested within the last 12 months?
- ▶ Are carbon monoxide detectors properly installed and currently functioning?
- ▶ If the FCC home has a basement, and local health officials recommend radon detectors, are radon detectors installed?
- ▶ Is a fire extinguisher available?
- ▶ Is the fire extinguisher easily accessible?
- ▶ Is there a service date on the fire extinguisher showing it has been updated at least annually?

Licensing—EnvHS 1.3

- ▶ Does the program have a current child care license for this FCC home?

Pre-Site Conversation

Fire Inspections—EnvHS 1.3

- ▶ How many of your buildings are required to have fire-prevention inspections conducted?
- ▶ How many of those buildings have had a fire-prevention inspection conducted?
- ▶ How many of those buildings failed their fire inspections?
- ▶ What were the issues that caused them to fail their fire inspections?

Building Inspections—EnvHS 1.3

- ▶ How many of your buildings are required to have building inspections conducted?
- ▶ How many of those buildings have had a building inspection conducted?
- ▶ How many of those buildings failed their building inspections?
- ▶ What were the issues that caused them to fail their building inspections?

Appendix B: Description of the Aligned Monitoring System

In FY 2015, OHS implemented a newly aligned monitoring system to address the OHS's grant cycle shift from an indefinite to a five-year project period. Additionally, OHS increased its focus on quality in addition to compliance and prioritized having more frequent interaction with grantees to provide information to support their continuous improvement in core performance areas. OHS identified core performance areas as:

- ▶ Environmental Health and Safety,
- ▶ Management Systems and Program Governance,
- ▶ Fiscal Integrity and Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA),
- ▶ Comprehensive Services and School Readiness, and
- ▶ Teacher-Child Interactions (as addressed through the CLASS™ observation instrument).

All five-year grants are monitored using the Aligned Monitoring System. Indefinite grants are monitored when they transition to a 5-year grant. The Aligned Monitoring System provides the OHS with comprehensive performance data needed by Year 4 of the 5-year grant. OHS will evaluate the data to determine whether the grantee will need to re-compete.

The OHS designed the Aligned Monitoring System to provide different review processes based on the grantee's history: the *Comprehensive Monitoring Process* and the *Differential Monitoring Process*. The monitoring process that a grantee receives is determined by whether or not they meet a specific set of criteria. The criteria include:

- ▶ No findings on the previous review cycle,
- ▶ No fiscal findings in the past two review cycles,
- ▶ No findings in the annual audits,
- ▶ No Designation Renewal System (DRS) criteria met,
- ▶ No significant program changes (e.g., changes in program leadership), and
- ▶ No concerns identified through input from the Regional Office.

Grantees that do not meet the above listed criteria will engage in the *Comprehensive Monitoring Process*. Those grantees that do meet the criteria will receive the *Differential Monitoring Process*.

The *Comprehensive Monitoring Process* is comprised of six individual review events: Environmental Health and Safety; Fiscal Integrity and ERSEA; CLASS™; Management Systems

and Program Governance; and Comprehensive Services and School Readiness. Individual review events will only focus on one area at a time, giving the grantee and the reviewer a better opportunity to achieve a more in-depth review of the content area.

The *Differential Monitoring Process* recognizes grantees that have demonstrated a history of compliance. Grantees eligible for this process will first receive a Head Start Key Indicators-Compliant (or HSKI-C) review. The Head Start Key Indicators-Compliant (HSKI-C) Protocol is a research-based monitoring instrument that the Office of Head Start (OHS) is using to identify grantees that are eligible for differential monitoring. The HSKI-C protocol is an abbreviated version of the protocols used in the Comprehensive Monitoring System. It is comprised of 27 Compliance Measures that were selected based on how strongly they differentiated between high and low performing grantees. The HSKI-C covers the following review areas:

- Management Systems & Program Governance
- Comprehensive Services & School Readiness
- Fiscal Integrity

Grantees that are successful in, or pass, the HSKI-C review will only receive the Environmental Health and Safety and CLASS™ review events. Successful grantees will receive the full complement of comprehensive reviews during their next 5-year grant cycle. If grantees do not pass the HSKI-C, they will go through the Comprehensive Monitoring Process.

After each review event, grantees will receive a report that summarizes findings and/or concerns for that specific content area. At the end of Year 4, grantees will receive a “roll-up” report summarizing the results of review events held in Years 1 through 3.

Appendix C: Glossary

Term	Definition
ACF	Administration for Children and Families in the U.S. Department of Health and Human Services (HHS) (includes the Regional Offices).
Actual Enrollment	Actual enrollment includes all children (and pregnant women) regardless of funding source (ACF or non-ACF) who are participating in a Head Start or Early Head Start program, and have attended at least one class or received at least one home visit. Related Terms: Funded Enrollment and ACF.
Area of Noncompliance (ANC)	An Area of Noncompliance (ANC) is a type of review decision recorded in a complete Head Start Review Report that documents a grantee's lack of compliance with one or more Head Start program requirements. Depending on the documented severity of the grantee's lack of compliance and the degree to which the situation poses a threat to the safety and well-being of enrolled children, an Area of Noncompliance may become partial or sole justification for a deficiency determination or for a noncompliance determination. An Area of Noncompliance begins as a Preliminary Area of Noncompliance (PANC) identified by the review team in the field. A PANC becomes an Area of Noncompliance when OHS decides the PANC has sufficient evidentiary support to justify a noncompliance or deficiency determination. Related Terms: Deficiency, Determination, Noncompliance, Preliminary Area of Noncompliance, Head Start Performance Standards and Head Start Program Requirements.
Citation	A citation is a performance standard referenced on a Preliminary Area of Noncompliance or an Area of Noncompliance. Related Terms: Area of Noncompliance, Preliminary Area of Noncompliance and Performance Standards.
Completed Review	A completed review is a conducted monitoring review of any type (triennial, first-year, other or follow-up) for which the Head Start Review Report has been officially received by the grantee. Related Term: Head Start Review Report
Deficiency	The Head Start Act, as amended in 2007, defines a deficiency (Section 637 [42 U.S.C. 9832]) as follows: <i>(A) Systemic or substantial material failure of an agency in an area of performance that the Secretary determines involves:</i> <i>(i) A threat to the health, safety, or civil rights of children or staff;</i> <i>(ii) A denial to parents of the exercise of their full roles and responsibilities related to program operations;</i> <i>(iii) A failure to comply with standards related to early childhood development and health services, family and community partnerships, or program design and management;</i> <i>(iv) The misuse of funds received under this subchapter;</i> <i>(v) Loss of legal status (as determined by the Secretary) or financial viability, loss of</i>

Term	Definition
	<p><i>permits, debarment from receiving Federal grants or contracts, or the improper use of Federal funds; or</i></p> <p><i>(vi) Failure to meet any other Federal or State requirement that the agency has shown an unwillingness or inability to correct, after notice from the Secretary, within the period specified;</i></p> <p><i>(B) Systemic or material failure of the governing body of any agency to fully exercise its legal and fiduciary responsibilities; or</i></p> <p><i>(C) An unresolved area of noncompliance.</i></p> <p><i>Deficiency is an OHS determination that a grantee has failed to substantially to provide the required services or to substantially implement required procedures.</i></p> <p>A deficiency [determination] is documented in a final Review Report and includes one or more Areas of Noncompliance. In a report, a statement of a deficiency determination includes a corrective action timeframe (of 30 days or 180 days depending on the severity), a finding category or deficiency type, and required corrective actions (Follow-up review and/or Quality Improvement Plan (QIP)).</p> <p>Related Terms: Area of Noncompliance, Determination, Grantee, Quality Improvement Plan (QIP) and Head Start Review Report.</p>
Delegate Agency	<p>A delegate agency is a public or private nonprofit or for-profit organization or agency to which a Head Start grantee has delegated by written agreement the carrying out of all or part of its responsibility for operating a Head Start program or programs.</p> <p>Related Terms: Grantee and Head Start Program.</p>
Determination	<p>A determination is an Office of Head Start decision regarding a grantee’s lack of compliance with state and/or federal requirements. A determination is documented in the Head Start Review Report and is supported by one or more Areas of Noncompliance each citing one or more performance standards. There are two types of determinations: Deficiency Determinations and Noncompliance Determinations. A determination statement indicates the type of determination, the corrective action timeframe, the required corrective actions (Follow-up review and/or Quality Improvement Plan (QIP)).</p> <p>Related Terms: Deficiency, Noncompliance, Quality Improvement Plan (QIP) and Head Start Review Report.</p>
Early Head Start Program	<p>An agency or delegate agency funded under the Head Start Act to provide comprehensive child development services to children from birth to three years of age and pregnant women.</p> <p>Related Terms: Delegate Agency and Head Start Program.</p>
Fiscal Year (FY)	<p>Twelve-month accounting period (federal FY 2009 began on October 1, 2008 and ended on September 30, 2009).</p>
Follow-up Review	<p>Return visits made to grantees to verify whether corrective actions have been implemented. Determinations in First-year, Triennial or Other reviews indicate whether or not a Follow-up review is required, and the timeframe within which the grantee must correct the Areas of Noncompliance. If the initial Follow-up review team identifies that one or more Areas of Noncompliance have not</p>

Term	Definition
	<p>been corrected, the Office of Head Start (OHS) may decide a second Follow-up review is required. Less often, a third or fourth Follow-up review is conducted.</p> <p>Related Terms: Triennial Review, First-Year Review, Other Review and Monitoring Reviews.</p>
Funded Enrollment	<p>Funded enrollment is the total number of children (and pregnant women) that a Head Start (Early Head Start or Head Start/Early Head Start) program is to serve as indicated on the federal Financial Assistance Award from ACF.</p> <p>Related Terms: Actual Enrollment and ACF.</p>
Grant	<p>A federally funded monetary award that is provided to an agency to perform Head Start (Early Head Start or Head Start/Early Head Start) services either directly or through delegate agencies.</p> <p>Related Terms: Grantee and Head Start Program.</p>
Grantee	<p>An agency (i.e. public or private nonprofit, school system) that has been awarded one or more grants by the Administration for Children and Families (ACF) to administer one or more Head Start programs (Early Head Start or Head Start/Early Head Start) or to oversee the programs administered by a delegate agency.</p> <p>Related Terms: Delegate Agency and Program Type.</p>
Grantee Compliance Status	<p>The final determination made on the grantee by the Office of Head Start (OHS) based on the results of the on-site monitoring review. The status is one of the following:</p> <ol style="list-style-type: none"> 1) Compliant: Grantees without a noncompliant or deficient finding 2) Having one or more noncompliances: Grantees with one or more noncompliant findings 3) Having one or more deficiencies: Grantees with one or more deficient findings, deficient grantees may have one or more noncompliant findings in addition to one or more deficient findings <p>Related terms: Deficiency and Noncompliance.</p>
Head Start Program	<p>An agency or delegate agency funded under the Head Start Act to provide comprehensive child development services.</p> <p>Related Terms: Delegate Agency and Early Head Start Program.</p>
Head Start Program Requirements	<p>The Head Start Program Requirements include the Head Start Program Performance Standards and applicable laws, regulations and policy requirements to which all grantees operating a Head Start program must adhere. During the on-site monitoring review, review teams assess grantee's compliance with the Head Start Program Requirements.</p> <p>Related Terms: Head Start Program Performance Standards and Monitoring Reviews.</p>

Term	Definition
Head Start Review Report	<p>The Head Start Review Report serves as legal notice to a Head Start grantee of the results of the on-site monitoring review. It provides the grantee with detailed information on the areas in which the grantee is not meeting Head Start program requirements. The Head Start Review Report also documents the corrective action timeframes that the grantee has to resolve the issues addressed in the report.</p> <p>Related Terms: Completed Review, Conducted Review, Corrective Action Timeframe, Deficiency and Noncompliance.</p>
HHS	<p>U.S. Department of Health and Human Services, which oversees the Administration for Children and Families (ACF).</p> <p>Related Terms: Administration for Children and Families (ACF).</p>
Monitoring Reviews	<p>Per Section 641A of the Head Start Act, grantees are required to receive a full-on-site monitoring review every three years (i.e. Triennial reviews) and newly funded programs are required to receive a monitoring review after their first full year (i.e. Regular First-year reviews) of providing Head Start services. Programs that are not in compliance with Head Start federal regulations and requirements during the on-site monitoring review are required to have a Follow-up review to verify whether corrective actions have been implemented. There are four main types of monitoring reviews or review types: 1) Triennial, 2) Regular First-Year, 3) Other, and 4) Follow-up.</p> <p>Related Terms: Head Start Program Performance Standards, Head Start Program Requirements, Triennial Review, Regular First-Year Review, Other Review and Follow-up Review.</p>
Noncompliance	<p>A noncompliance is an area of noncompliance (ANC) citing one or more performance standards and related to a noncompliance determination in the completed Head Start Review Report.</p> <p>Related Terms: Area of Noncompliance, Determination, Grantee, Quality Improvement Plan (QIP) and Head Start Review Report.</p>
Office of Head Start (OHS)	<p>Within the Administration for Children and Families in the U.S. Department of Health and Human Services (HHS), the Office of Head Start (OHS) serves as the principal advisory unit to the Assistant Secretary on issues regarding the Head Start program. OHS provides leadership, coordinates activities, develops legislative and budgetary proposals, and presents objectives and initiatives for the Head Start program. (OHS was formerly the Head Start Bureau.)</p> <p>Related Terms: U.S. Department of Health and Human Services (DHHS) and Administration for Children and Families (ACF).</p>
OHSMS Software	<p>An integrated technology solution supporting a broad spectrum of monitoring review activities: pre-site planning and document-sharing, on-site review coordination and documentation, and post-review corrective action activities.</p>
Other Review	<p>Alerted to a potential performance issue or concern with a grantee, OHS may resolve to conduct an out-of-cycle review, referred to as an Other review. Other reviews, unlike Triennial and Regular First-Year reviews, are non-routine in nature.</p>

Term	Definition
	Related Terms: Triennial Review, Follow-up Review and Monitoring Reviews.
Performance Standards (Head Start Program Performance Standards) and other regulations	<p>Head Start functions, activities, and facility criteria required to meet the objectives of the Head Start program as they relate directly to children and their families. The Performance Standards are one source for measuring grantee compliance.</p> <p>Related Terms: Head Start Program Requirements.</p>
Preliminary Area of Noncompliance (PANC)	<p>A preliminary conclusion of a grantee’s failure to comply with a given Head Start program performance standard or regulation. This conclusion is based on evidence collected by the review team during the monitoring review. A PANC becomes an Area of Noncompliance in a final Review Report if OHS determines that the PANC has sufficient evidence and documentation.</p> <p>Related Terms: Area of Noncompliance, Determination, Grantee and Head Start Review Report.</p>
Program Type	<p>Program type describes the category of services (i.e. Early Head Start or Head Start) that a Head Start program provides. There are three program types: 1) Head Start, 2) Early Head Start, and 3) Head Start/Early Head Start.</p> <p>Related Terms: Head Start, Early Head Start and Head Start Program.</p>
Protocol	<p>In Fiscal Year 2007, OHS introduced a new integrated Monitoring Protocol that was designed to assess the performance and compliance of Head Start grantees in a more focused, efficient, and comprehensive manner. The protocol focused on the delivery of services as well as the management systems that support services, accountability, and fiscal integrity. This integrated protocol contains a set of compliance questions that cover all program service areas and management systems. Each compliance question is directly linked to a regulation; therefore, any review activity including interviews, observations or document review relates to a clearly defined performance requirement. Requiring review teams to adhere to a uniform and defined set of compliance questions increases focus, efficiency, fairness and comprehensiveness of the scope of the review.</p>
Quality Improvement Plan (QIP)	<p>Once a grantee is determined to have one or more deficiencies, the grantee must submit for approval a quality improvement plan (QIP) to the Regional Office outlining the deficiencies to be corrected, the actions to be taken to correct each deficiency, and the timeframe for accomplishing the corrective actions specified</p> <p>Related Terms: Determination and Deficiency.</p>
Regular First-Year Review	<p>Newly funded Head Start grantees are reviewed after their first full year of operation. These types of reviews are commonly referred to as “First-Year” reviews. After their first-year review, grantees will then be reviewed every three years.</p> <p>Related Terms: Triennial Review, Follow-up Review, Other Review and Monitoring Reviews.</p>
	Decision about a grantee’s compliance with applicable laws and regulations

Term	Definition
<i>Review Decision</i>	based on evidence collected during the monitoring review. (Review decisions include “no areas of noncompliance,” “areas of noncompliance,” and deficiency determinations.)
	Related Terms: Areas of Noncompliance, Deficiency, Noncompliance, Determination and Monitoring Reviews.
<i>Review Team Leader (RTL)</i>	Staff person who leads the monitoring review team. The team leader (or RTL) delegates tasks, assigns reviewers to complete sections of the Protocol, and facilitates and coordinates interaction between grantee staff and review team members.
	Related Terms: Monitoring Reviews.
<i>Reviewer</i>	Member of a monitoring review team who under the guidance of the monitoring review team leader gathers evidence through observations, interviews and document review to assess the performance of a Head Start grantee being reviewed.
	Related Terms: Monitoring Reviews.
<i>Triennial Review</i>	Head Start grantees undergo monitoring reviews every three years. These types of reviews are referred to as “Triennial” reviews.
	Related Terms: First-Year Review, Follow-up Review, Other Review and Monitoring Reviews.

Appendix D: References

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