
	<b>DHS Early Head Start Program Policy</b>		
<b>PDM 10</b>			
<b>SUBJECT</b>	Personnel		
<b>REFERENCE</b>	Program Design and Management		
<b>EFFECTIVE</b>	8/1/2016		
<b>Policy Council Approval: 7/26/16</b>	<b>Policy Council Revision: 7/28/20</b>	<b>Governing Body Approval: 9/19/16</b>	<b>Governing Body Revision: 8/13/20</b>
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**Policy:**

The Head Start Program, including Early Head Start (EHS), and Education Service Providers will abide by their internal agency personnel policies and procedures which must meet or exceed applicable requirements including Head Start regulations as well as local, state, and federal laws.

The City of San Antonio Head Start Program personnel policies must be approved by the Governing Board, or the designated Advisory Committee, and Policy Council and must be available to all staff. The Head Start Policy Council will approve decisions regarding the employment of program staff as stated in paragraph 1(E)(iv)(IX), regarding the hiring, evaluation, compensation, and termination of the Executive Director, Head Start Director, and any other person in an equivalent position within the Head Start Program.

The Head Start Program collaborates with the City of San Antonio's Human Resources Department to ensure all newly hired City staff complete the required criminal background checks prior to employment. According to the City of San Antonio's Administrative Directive (AD) 4.55, the City conducts Criminal Background Checks (CBC) as part of the initial employment process and applies to volunteers and interns.

**Head Start Program and Education Service Provider Background Check Requirements:**

- a. Before a person is hired, directly or through a contract, including transportation staff and contractors, the Head Start Program and Education Service Providers must conduct an interview, verify references, conduct a sex offender registry check and obtain one of the following:
  - i. State or tribal criminal history records, including fingerprint checks; or,
  - ii. Federal Bureau of Investigation criminal history records, including fingerprint checks.

- b. A program has 90 days after an employee is hired to complete the background check process by obtaining:
  - i. Whichever check listed in paragraph (a) of this section was not obtained prior to the date of hire; and,
  - ii. Child abuse and neglect state registry check, if available.
- c. A program must review the information found in each employment application and complete background check to assess the relevancy of any issue uncovered by the complete background check.
- d. A program must ensure a newly hired employee, consultant, or contractor does not have unsupervised access to children until the background check process is complete.
- e. A program must conduct the complete background check for each employee, consultant, or contractor at least once every five years and must include each of the four checks listed above.
- f. A program must provide new hire(s) start date, criminal background check date and teaching credentials to the assigned DHS Early Head Start staff member according to the City of the San Antonio Benchmark Due Date Guide.

e.

Staff who has direct contact with children will abide by Department of Health and Human Services Commission Child Care Regulation requirements, whichever is most stringent.

The Head Start Program will consider current and former program parents for employment vacancies for which such parents apply and are qualified.

**Performance Standard(s):**

1302.90(a-b)

**Head Start Act:**

642(c)(1)(E)(iv)(V)(cc); 642(c)(1)(E)(IX); 642(c)(2)(D)(vi)

**City of San Antonio Administrative Directive (AD):**

4.55 Background Checks/Reporting Arrests, Indictments and Convictions