




# ***Approval of Head Start and Early Head Start (EHS) Policy Updates***



# Head Start

 <b>2024-2025 Head Start Policy Index</b>		<b>Change Required?</b>	<b>Description of Change made to current Policy</b>
<b>Education and Early Childhood Development</b>			
1	Home Visits/ Parent Conferences	YES	Clarification regarding home visits and parent conferences.
7	Ongoing Assessment	YES	Change to language of instruction to align with school district policies.
11	Discipline and Guidance	YES	Additional guidance related discipline and guidance.
<b>Environmental Health and Safety</b>			
2	Staffing and Class Size Requirements	YES	Clarified policy to only include information related to class size requirements.
8	Supervision	YES	Name Change - Added staffing requirements from Environmental Health & Safety Policy 2.
<b>Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA)</b>			
12	Classroom Age Designation	YES	New policy after revising Environmental Health & Safety Policy 2.
<b>Program Design and Management (PDM)</b>			
9	Critical Incident Reporting	YES	Provided additional guidance related to reporting requirements.
10	Personnel	YES	Provided additional guidance related to reporting new hire information.
11	Program Governance	YES	Provided additional guidance related to new procedure regarding what is shared with the Head Start Policy Council and Advisory Committee.
18	Program Data- Access and Security	YES	Clarification regarding communication and confidentiality.
19	Management of Program Data	YES	Clarification regarding communication and confidentiality.
21	Medical Bills	YES	New policy related to medical bills.
22	Program Services	YES	New policy after revising Environmental Health & Safety Policy 2 and clarification on services and hours.
<b>Transportation</b>			
1	General Requirements	YES	Clarification regarding enrollment and field trips.
3	Child Restraint Systems	YES	Clarification regarding transportation requirements and waivers.

	<b>DHS Head Start Program Policy</b>		
<b>EDUCATION 1</b>			
<b>SUBJECT</b>	Home Visits/Parent Conferences		
<b>REFERENCE</b>	Education and Early Childhood Development		
<b>EFFECTIVE</b>	6/23/2015		
<b>Policy Council Approval: 7/25/17</b>	<b>Policy Council Revision: 5/25/21</b>	<b>Governing Body Approval: 9/28/17</b>	<b>Governing Body Revision: 5/27/21</b>
<b>PAGE: 1 of 2</b>			

**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 cannot be conducted on the same date. Dates should be scheduled at intervals to allow for student growth, progress, and meaningful conversations.

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

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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 related to scheduling, safety, and meeting location of the Home Visit and Parent Conference. Additionally, the -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.

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**Performance Standard(s):**

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

	<b>DHS Head Start Program Policy</b>		
<b>EDUCATION 1</b>			
<b>SUBJECT</b>	Home Visits/Parent Conferences		
<b>REFERENCE</b>	Education and Early Childhood Development		
<b>EFFECTIVE</b>	6/23/2015		
<b>Policy Council Approval: 7/25/17</b>	<b>Policy Council Revision: Pending</b>	<b>Governing Body Approval: 9/28/17</b>	<b>Governing Body Revision: 5/27/21</b>
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1302.34 (b)(2-3, 7-8); 1302.46; 1302.50; 1302.71(a, b, e)



	<b>DHS Head Start Program Policy</b>		
<b>EDUCATION 7</b>			
<b>SUBJECT</b>	Ongoing Assessment		
<b>REFERENCE</b>	Education and Early Childhood Development		
<b>EFFECTIVE</b>	8/2/2011		
<b>Policy Council Approval: 7/25/17</b>	<b>Policy Council Revision: 5/25/21</b>	<b>Governing Body Approval: 9/28/17</b>	<b>Governing Body Revision: 5/27/21</b>
<b>PAGE: 1 of 1</b>			

**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 language of instruction. ~~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)

	<b>DHS Head Start Program Policy</b>		
<b>EDUCATION 7</b>			
<b>SUBJECT</b>	Ongoing Assessment		
<b>REFERENCE</b>	Education and Early Childhood Development		
<b>EFFECTIVE</b>	8/2/2011		
<b>Policy Council Approval: 7/25/17</b>	<b>Policy Council Revision: Pending</b>	<b>Governing Body Approval: 9/28/17</b>	<b>Governing Body Revision: 5/27/21</b>
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	<b>DHS Head Start Program Policy</b>		
<b>EDUCATION 11</b>			
<b>SUBJECT</b>	Discipline and Guidance		
<b>REFERENCE</b>	Education and Early Childhood Development		
<b>EFFECTIVE</b>	12/13/2011		
<b>Policy Council Approval: 7/25/17</b>	<b>Policy Council Revision: 5/23/23</b>	<b>Governing Body Approval: 9/28/17</b>	<b>Governing Body Revision: 6/15/23</b>
<b>PAGE: 1 of 2</b>			

**Policy:**

Education Service Providers will develop and implement policies and procedures on discipline and guidance appropriate for children 3-5 years old. A copy must be provided to all parents/guardians, staff, volunteers, substitute teachers, and contractors. Documentation must be maintained showing receipt of the written discipline and guidance policies and procedures.

The policies and procedures must include positive methods that build self-esteem and support self-control and self-regulation such as:

- Praise and encouragement of developmentally appropriate behavior
- Frequent reminders of behavior expectations using clear and positive statements
- Redirection of behavior using positive statements

The policies and procedures must include guidance on appropriate communication with parents/guardians regarding a child's behavior.

Discipline must be constructive, individualized, and consistent for each child, appropriate to the child's level of understanding, and directed toward teaching the child developmentally appropriate behavior. Education Service Providers must prohibit or severely limit the use of suspension due to a child's behavior. The Education Service Providers must not expel or unenroll a child from Head Start due to a child's behavior, unless approved by the Head Start Administrator.



When appropriate, for the child's age and development, a brief supervised separation, or time away from the group, may be necessary, and should be limited to no more than one minute per year of the child's age.

There must be no harsh, cruel, or unusual treatment of any child. The following are prohibited:

- Corporal punishment or threats of corporal punishment
- Punishment associated with food, naps, or toileting
- Pinching, shaking, or biting a child
- Hitting a child with hand or an object
- Putting anything in or on a child's mouth
- Humiliating, ridiculing, rejecting, or yelling at a child
- Pointing a finger in a child's face
- Snapping fingers at a child
- Use of isolation to discipline a child
- Binding or tying a student to restrict movement
- Threatening phrases or sarcastic language
- Threatening to call a child's parent/guardian related to behavior
- Subjecting a child to harsh, abusive, or profane language
- Placing a child in a locked or dark room, bathroom, or closet with the door closed
- Requiring a child to remain silent or inactive for inappropriately long periods of time for the child's age
- Child restraint performed by staff not certified in proper restraint procedures
- Withholding outdoor free play
- Requiring a parent/guardian to pick up a child due to misbehavior

**Performance Standard(s):**

1302.17; 1302.31 (e)(2,4);1302.90 (c)(1-2)

	<b>DHS Head Start Program Policy</b>		
<b>EDUCATION 11</b>			
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**Performance Standard(s):**

1302.17; 1302.31 (e)(2,4);1302.90 (c)(1-2)

	<b>DHS Head Start Program Policy</b>			
<b>EnvHS 2</b>				
<b>SUBJECT</b>	<del>Staffing and</del> Class Size Requirements			
<b>REFERENCE</b>	Environmental Health and Safety			
<b>EFFECTIVE</b>	3/13/2012			
<b>Policy Council Approval: 7/25/17</b>	<b>Policy Council Revision: 5/25/21</b>	<b>Governing Body Approval: 9/28/17</b>	<b>Governing Body Revision: 5/27/21</b>	
				<b>PAGE: 1 of 2</b>

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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.~~

~~Head Start group/classroom size are determined by the age of the majority of children and the needs of children present.~~

~~Education Service Providers must establish the classroom age designation of each classroom at the start of the year and may adjust this determination during the program year as needed.~~

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~~A class that serves a majority of children who are three years olds (51% or more), must have no~~

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more than 17 children. A class that serves a majority of children who are four and five years old (51%), must have no more than 20 children. Class sizes are also determined based on square footage, with a minimum of 35 square feet of usable indoor space per child available for the care and use of children and at least 75 square feet of usable outdoor play space per 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 Head Start Grant Recipient.~~

~~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)

	<b>DHS Head Start Program Policy</b>		
<b>EnvHS 2</b>			
<b>SUBJECT</b>	Class Size Requirements		
<b>REFERENCE</b>	Environmental Health and Safety		
<b>EFFECTIVE</b>	3/13/2012		
<b>Policy Council Approval: 7/25/17</b>	<b>Policy Council Revision: Pending</b>	<b>Governing Body Approval: 9/28/17</b>	<b>Governing Body Revision: 5/27/21</b>
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Education Service Providers must establish the classroom age designation of each classroom at the start of the year and may adjust this determination during the program year as needed.

A class that serves a majority of children who are three years olds (51% or more), must have no more than 17 children. A class that serves a majority of children who are four and five years old (51%), must have no more than 20 children. Class sizes are also determined based on square footage, with a minimum of 35 square feet of usable indoor space per child available for the care and use of children and at least 75 square feet of usable outdoor play space per child.

**Performance Standard(s):**

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

	<b>DHS Head Start Program Policy</b>			
<b>EnvHS 8</b>				
<b>SUBJECT</b>	Staffing and Supervision			
<b>REFERENCE</b>	Environmental Health and Safety			
<b>EFFECTIVE</b>	4/21/2016			
<b>Policy Council Approval:</b> 7/25/17	<b>Policy Council Revision:</b> 4/23/19	<b>Governing Body Approval:</b> 9/28/17	<b>Governing Body Revision:</b> 5/23/19	
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**Policy:**

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Education Service Providers must develop a system to address required breaks and planning time. The Head Start Program allows aides/instructional assistants/paraprofessionals to supervise a classroom during these required breaks and planning time, as long as there are two paid staff persons with the class.

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.

Education Service Providers will develop and implement active supervision procedures. No child will be left alone or unsupervised for any period of time.

**Performance Standard(s):**



1302.21(b), 1302.90; 1302.47 (b){2}{iii}; 1302.47(b){S}{i}; 1302.47(b) (S){iii}; 1302.94(b)

**Other Resources:**

ACF-IM-HS-15-05

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	<b>DHS Head Start Program Policy</b>		
<b>EnvHS 8</b>			
<b>SUBJECT</b>	Staffing and Supervision		
<b>REFERENCE</b>	Environmental Health and Safety		
<b>EFFECTIVE</b>	4/21/2016		
<b>Policy Council Approval:</b> 7/25/17	<b>Policy Council Revision:</b> 4/23/19	<b>Governing Body Approval:</b> 9/28/17	<b>Governing Body Revision:</b> 5/23/19
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**Other Resources:**

ACF-IM-HS-15-05

	<b>DHS, Head Start Program Policy</b>		
<b>ERSEA 12</b>			
<b>SUBJECT</b>	Classroom Designation		
<b>REFERENCE</b>	Eligibility, Recruitment, Selection, Enrollment, and Attendance		
<b>EFFECTIVE</b>			
<b>Policy Council Approval:</b>	<b>Policy Council Revision:</b>	<b>Governing Body Approval:</b>	<b>Governing Body Revision:</b>
<b>PAGE: 1 of 1</b>			

**Policy:**

Education Service Providers must establish the classroom age designation of each classroom prior to the start of the program year and may adjust this determination during the program year, as needed. Group/classroom size designations are determined by the age of the majority of children and the needs of children present.



A class that serves a majority of children who are three years olds (51% or more), must have no more than 17 children. A class that serves a majority of children who are four and five years old (51%), must have no more than 20 children. Class sizes are also determined based on square footage, with a minimum of 35 square feet of usable indoor space per child available for the care and use of children and at least 75 square feet of usable outdoor play space per child.

To ensure children and families of greatest need are enrolled in the program and to ensure the program meets funded enrollment, Education Service Providers may adjust the classroom age designation at any point in time during the school year without prior approval from DHS Head Start based on the current age of children enrolled in the classroom.

The City of San Antonio DHS Head Start allows for mixed age classrooms, 3- and 4-year-old children enrolled in the same classroom. Education Service Providers should consider the best placement for a child. It is not recommended to place a three-year-old child in a classroom with a majority of the children four and five years old.

**Performance Standard:**

1302.21

		<b>DHS Head Start Program Policy</b>		
<b>PDM 9</b>				
<b>SUBJECT</b>	Critical Incident Reporting			
<b>REFERENCE</b>	Program Design and Management			
<b>EFFECTIVE</b>	12/13/2011			
<b>Policy Council Approval: 7/28/20</b>	<b>Policy Council Revision: 5/23/23</b>	<b>Governing Body Approval: 8/13/20</b>	<b>Governing Body Revision: 6/15/23</b>	
<b>PAGE: 1 of 2</b>				

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#### Policy:

The Head Start Program, including the Grant Recipient and Education Service Providers, will develop and implement procedures 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/neglect which may or may not have occurred during Head Start hours.
- Allegations of child abuse/neglect or maltreatment against any Head Start staff member, volunteer, consultant, and or contractor, including, but not limited to grabbing, shoving, shaking, swatting, or dragging a child; spanking or any other type of corporal or physical punishment; binding, tying, or taping a child; terrorizing a child with threats or menacing acts; or any form of sexual contact.
- Incidents which may have placed a child, family member, or staff in danger.
- Any incident where a child is left unsupervised while in the care or under the supervision of program staff, which includes leaving a child alone anywhere on the grounds of a Head Start facility (e.g., in a classroom, bathroom, on a playground), as well as outside the facility in a parking lot, on a nearby street, or on a bus or another program-approved transportation or excursion/field trip.
- Any incident that involves a classroom that is out of ratio. 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. Any situation that involves a classroom out of ratio for a longer period of time should be reported.

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- Inappropriate discipline, which is any type of conduct used to instill fear or humiliate rather than to educate a child, such as poking or pinching a child; making fun of or laughing about a child; using/withholding food or an activity as a punishment or reward; or isolating a child.
- Health incidents and illnesses, which include, but are not limited to:
  - Injuries that require urgent medical attention by a health-care professional, such as a broken bone; a severe sprain; chipped or cracked teeth; head trauma; deep cuts; contusions or lacerations; or animal bites.
  - Child or staff member leaving by emergency medical transport.
  - Any reportable disease/illnesses, as indicated by the Centers for Disease Control and Prevention, State of Texas, the Texas Education Agency, the City of San Antonio Metro Health Department, or School District Health Department Child receiving outside medical attention at any point in time for an injury sustained during Head Start program hours.
- Unauthorized release where a child is released from a Head Start facility, bus, or other approved program transportation to a person without the permission or authorization of a parent or legal guardian and whose identity had not been verified by photo identification.
- Any incident which has the potential to generate negative media coverage.
- Any media inquiry/ coverage of the program.
- Unplanned interruption in Head Start 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. Education Service Providers must also provide notification to the Head Start Administrator or designee within 24 hours.



**Performance Standard(s):**

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

**Information**

**Memorandum:** ACF-IM-  
HS-22-07



	<b>DHS Head Start Program Policy</b>		
<b>PDM 9</b>			
<b>SUBJECT</b>	Critical Incident Reporting		
<b>REFERENCE</b>	Program Design and Management		
<b>EFFECTIVE</b>	12/13/2011		
<b>Policy Council Approval: 7/28/20</b>	<b>Policy Council Revision: 5/23/23</b>	<b>Governing Body Approval: 8/13/20</b>	<b>Governing Body Revision: 6/15/23</b>
<b>PAGE: 1 of 2</b>			

**Policy:**

The Head Start Program, including the Grant Recipient and Education Service Providers, will develop and implement procedures 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/neglect which may or may not have occurred during Head Start hours.
- Allegations of child abuse/neglect or maltreatment against any Head Start staff member, volunteer, consultant, and or contractor, including, but not limited to grabbing, shoving, shaking, swatting, or dragging a child; spanking or any other type of corporal or physical punishment; binding, tying, or taping a child; terrorizing a child with threats or menacing acts; or any form of sexual contact.
- Incidents which may have placed a child, family member, or staff in danger.
- Any incident where a child is left unsupervised while in the care or under the supervision of program staff, which includes leaving a child alone anywhere on the grounds of a Head Start facility (e.g., in a classroom, bathroom, on a playground), as well as outside the facility in a parking lot, on a nearby street, or on a bus or another program-approved transportation or excursion/field trip.
- Any incident that involves a classroom that is out of ratio. 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. Any situation that involves a classroom out of ratio for a longer period of time should be reported.

- Inappropriate discipline, which is any type of conduct used to instill fear or humiliate rather than to educate a child, such as poking or pinching a child; making fun of or laughing about a child; using/withholding food or an activity as a punishment or reward; or isolating a child.
- Health incidents and illnesses, which include, but are not limited to:
  - Injuries that require urgent medical attention by a health-care professional, such as a broken bone; a severe sprain; chipped or cracked teeth; head trauma; deep cuts; contusions or lacerations; or animal bites.
  - Child or staff member leaving by emergency medical transport.
  - Any reportable disease/illnesses, as indicated by the Centers for Disease Control and Prevention, State of Texas, the Texas Education Agency, the City of San Antonio Metro Health Department, or School District Health Department Child receiving outside medical attention at any point in time for an injury sustained during Head Start program hours.
- Unauthorized release where a child is released from a Head Start facility, bus, or other approved program transportation to a person without the permission or authorization of a parent or legal guardian and whose identity had not been verified by photo identification.
- Any incident which has the potential to generate negative media coverage.
- Any media inquiry/ coverage of the program.
- Unplanned interruption in Head Start 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. Education Service Providers must also provide notification to the Head Start Administrator or designee within 24 hours.

**Performance Standard(s):**

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

**Information**

**Memorandum:** ACF-IM-  
HS-22-0

	<b>DHS Head Start Program Policy</b>		
<b>PDM 10</b>			
<b>SUBJECT</b>	Personnel		
<b>REFERENCE</b>	Program Design and Management		
<b>EFFECTIVE</b>	3/13/2012		
<b>Policy Council Approval: 7/25/17</b>	<b>Policy Council Revision: 7/28/20</b>	<b>Governing Body Approval: 9/28/17</b>	<b>Governing Body Revision: 8/13/20</b>
<b>PAGE: 1 of 2</b>			

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**Policy:**

The Head Start Program 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 CoSA 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.
- ef. A program must provide new hire(s) start date, criminal background check date and teaching credentials to the assigned DHS Head Start staff member according to the [City of the San Antonio Benchmark Due Date Guide](#).

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

	<b>DHS Head Start Program Policy</b>		
<b>PDM 10</b>			
<b>SUBJECT</b>	Personnel		
<b>REFERENCE</b>	Program Design and Management		
<b>EFFECTIVE</b>	3/13/2012		
<b>Policy Council Approval: 7/25/17</b>	<b>Policy Council Revision: 7/28/20</b>	<b>Governing Body Approval: 9/28/17</b>	<b>Governing Body Revision: 8/13/20</b>
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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

	<b>DHS Head Start Program Policy</b>		
<b>PDM 11</b>			
<b>SUBJECT</b>	Program Governance		
<b>REFERENCE</b>	Program Design and Management		
<b>EFFECTIVE</b>	3/13/2012		
<b>Policy Council Approval: 7/25/17</b>	<b>Policy Council Revision: 11/19/19</b>	<b>Governing Body Approval: 9/28/17</b>	<b>Governing Body Revision: 1/16/20</b>
<b>PAGE: 1 of 1</b>			

### Policy:

The City of San Antonio Head Start Program ~~(Program)~~ has established a formal structure for program governance: the City of San Antonio City Council is the Governing Body, and the Head Start Policy Council (Policy Council) is a body of elected parents of currently enrolled children and elected members of the community. City Council approves or disapproves legal and fiscal matters pertaining to the Head Start grant and oversees the Program. City Council has authorized subcommittees to oversee key responsibilities related to program governance and improvement of the Program. The Policy Council allows for parent participation in policy-making and other decisions about the program, as statutorily required by the Head Start Program Performance Standards and Section 642 (c) of the Head Start ~~Act~~.



The City of San Antonio Head Start Program will develop and implement procedures related to information reported to the ~~provide to~~ Head Start Policy Council (HSPC) and program governance advisory committees as required by the Head Start Program Performance Standards and Section 642 (c) of the Head Start Act .

In addition, the Program will establish parent committees exclusively of parents of currently enrolled children to advise staff and the Policy Council.

### Performance Standards Regulations:

Head Start Program Performance Standards Sec. 1301

Head Start Act of 2007 Sec. 642(c)(1)\ and Sec. 642(c)(2)

	<b>DHS Head Start Program Policy</b>		
<b>PDM 11</b>			
<b>SUBJECT</b>	Program Governance		
<b>REFERENCE</b>	Program Design and Management		
<b>EFFECTIVE</b>	3/13/2012		
<b>Policy Council Approval: 7/25/17</b>	<b>Policy Council Revision: 11/19/19</b>	<b>Governing Body Approval: 9/28/17</b>	<b>Governing Body Revision: 1/16/20</b>
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**Performance Standards:**

Head Start Program Performance Standards Sec. 1301

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	<b>DHS Head Start Program Policy</b>		
<b>PDM 18</b>			
<b>SUBJECT</b>	Program Data - Access and Security		
<b>REFERENCE</b>	Program Design and Management		
<b>EFFECTIVE</b>	April 23, 2018		
<b>Policy Council Approval: 1/22/19</b>	<b>Policy Council Revision: 5/23/23</b>	<b>Governing Body Approval: 2/28/19</b>	<b>Governing Body Revision: 6/15/23</b>
<b>PAGE: 1 of 3</b>			

**Policy:**

The Head Start Grant Recipient and Education Service Providers 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 understand and agree 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 grant or anyone who works with children or families enrolled in the Head Start or EHS 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 Health Insurance Portability and Accountability Act of 1996 (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 and information from unauthorized access, acquisition, or disclosure. Staff that share PHI, PII and IDEA Part B and C electronically must follow encryption guidelines and ensure the receiving entity is an authorized recipient of the specific data being delivered.

To ensure data protection, confidentiality, and to safeguard PHI, PII, and adhere to HIPAA, FERPA, and the Individuals with Disabilities Education Act (IDEA) Part B and C data, program staff should utilize a child or parent/guardian's ChildPlus ID and initials when communicating via email, TEAMS, or other electronic messaging system.

Staff may request parents/guardians to provide documents that contain PHI or PII via the secure ChildPlus Request Document feature.

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Staff ensures the environment in which they are working is secure and only authorized.

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All devices (e.g., laptops and phones) must have auto-lock enabled with a maximum timeout of 15 minutes. Staff are encouraged to lock their workstations manually when leaving their desk (Windows key + L or CTRL+ALT+DEL).

Disclosure of 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 Security Awareness Training
- HIPAA Training



Completion of these trainings are documented and maintained by the City of San Antonio Human Resources Department and/or the Training and Technical Assistance Team.

All DHS Head Start staff must acknowledge the 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)

	<b>DHS Head Start Program Policy</b>		
<b>PDM 18</b>			
<b>SUBJECT</b>	Program Data - Access and Security		
<b>REFERENCE</b>	Program Design and Management		
<b>EFFECTIVE</b>	April 23, 2018		
<b>Policy Council Approval: 1/22/19</b>	<b>Policy Council Revision: 5/23/23</b>	<b>Governing Body Approval: 2/28/19</b>	<b>Governing Body Revision: 6/15/23</b>
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Staff may request parents/guardians to provide documents that contain PHI or PII via the secure ChildPlus Request Document feature.

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

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All devices (e.g., laptops and phones) must have auto-lock enabled with a maximum timeout of 15 minutes. Staff are encouraged to lock their workstations manually when leaving their desk (Windows key + L or CTRL+ALT+DEL).

Disclosure of 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 Security Awareness Training
- HIPAA Training
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Completion of these trainings are documented and maintained by the City of San Antonio Human Resources Department and/or the Training and Technical Assistance Team.

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**Performance Standard:**

1302.101(b)(4)

	<b>DHS Head Start Program Policy</b>		
<b>PDM 19</b>			
<b>SUBJECT</b>	Management of Program Data		
<b>REFERENCE</b>	Program Design and Management		
<b>EFFECTIVE</b>	April 23, 2018		
<b>Policy Council Approval: 1/22/19</b>	<b>Policy Council Revision: 5/23/23</b>	<b>Governing Body Approval: 2/28/19</b>	<b>Governing Body Revision: 6/15/23</b>
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All DHS Head Start staff, regardless of position, share the responsibility to safeguard Family Educational Rights and Privacy Act (FERPA), Health Insurance Portability and Accountability Act of 1996 (HIPAA), PHI, PII, and the IDEA Part B and C related data and information from unauthorized access, acquisition, or disclosure. Staff that share PHI, PII and IDEA Part B and C information electronically must ensure the receiving entity is an authorized recipient of the specific data being delivered.

- Only computers and or device configured by the IT Department for use on the CoSA network or Education Service Provider 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. Staff should use a privacy screen for all monitors and laptop screens as appropriate.
- 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.
- All devices (e.g., laptops and phones) must have auto-lock enabled with a maximum timeout of 15 minutes. Staff are encouraged to lock their workstations manually when leaving their desk (Windows key + L or CTRL+ALT+DEL).
- If any PHI, PII, and/or IDEA Part B and C data is transmitted via email, the email must be encrypted.
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- 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.
- Staff should not request PHI, PII, and/or IDEA Part B and C data via text or email. Staff may request parents/guardians to provide documents that contain this information via the secure ChildPlus Request Document feature.

#### **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:



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- HIPAA Training

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- 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.
- All devices (e.g., laptops and phones) must have auto-lock enabled with a maximum timeout of 15 minutes. Staff are encouraged to lock their workstations manually when leaving their desk (Windows key + L or CTRL+ALT+DEL).
- If any PHI, PII, and/or IDEA Part B and C data is transmitted via email, the email must be encrypted.
- To ensure data protection, confidentiality, and to safeguard PHI, PII, and adhere to HIPAA, FERPA, and the Individuals with Disabilities Education Act (IDEA) Part B and C data, program staff should utilize a child or parent/guardian's ChildPlus ID and initials.
- 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.
- Staff should not request PHI, PII, and/or IDEA Part B and C data via text or email. Staff may request parents/guardians to provide documents that contain this information via the secure ChildPlus Request Document feature.

#### **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 Security Awareness Training
- HIPAA Training



Completion of these trainings are documented and maintained by the City of San Antonio Human Resources Department and/or the Training and Technical Assistance Team.

All DHS Head Start staff 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)

	<b>DHS Head Start Program Policy</b>		
<b>PDM 21</b>			
<b>SUBJECT</b>	Responsibility of fees related to injuries		
<b>REFERENCE</b>	Program Design and Management		
<b>EFFECTIVE</b>	05/2024		
<b>Policy Council Approval:</b>	<b>Policy Council Revision:</b>	<b>Governing Body Approval:</b>	<b>Governing Body Revision:</b>
<b>PAGE: 1 of 1</b>			

**Policy:**



The City of San Antonio is not responsible to pay medical bills, including ambulance fees, related to an injury sustained by a child, or their parent/guardian, enrolled in the City of San Antonio Department of Human Services Head Start Program (DHS Head Start). The City of San Antonio is a political subdivision of the State of Texas and subject to the Texas Tort Claims Act (Tex. Civ. Prac. & Rem. Code, Section 101.001, et. seq.), with limited liability.

Education Service Providers must ensure information related to liability and injuries sustained while on site or participating in services are available to parents/guardians with a child or children enrolled in the program. If a parent/guardian with a child enrolled in the DHS Head Start Program has a claim against the City of San Antonio, they may submit the claim to the Office of Risk Management at <https://www.sanantonio.gov/RiskManagement/Claims-Administration>

If a City of San Antonio Staff Member sustains an injury during work hours, regardless of location of the accident, they must contact their supervisor, submit an accident report, and follow the requirements outlined in Administrative Directive 4.84.

Any staff member employed by the Education Service Provider must follow the established school district and childcare center policies and procedures related to accidents and injuries.

**Reference:** Texas Torts Claims Act; City of San Antonio Administrative Directive 4.84; [City of San Antonio Risk Management](#)

	<b>DHS Head Start Program Policy</b>		
<b>PDM 22</b>			
<b>SUBJECT</b>	Head Start Program Services		
<b>REFERENCE</b>	Program Design and Management		
<b>EFFECTIVE</b>	05/2024		
<b>Policy Council Approval:</b>	<b>Policy Council Revision:</b>	<b>Governing Body Approval:</b>	<b>Governing Body Revision:</b>
<b>PAGE: 1 of 1</b>			



**Policy:**

Each program year, the City of San Antonio Department of Human Services Head Start Program (DHS Head Start) provides a minimum of 1,020 hours of planned class operations for the Head Start (HS) Prekindergarten Program, 1,380 hours of planned class operations for the Early Head Start (EHS) center-based program, and a 10-hour day for 240 days of planned class operations for the Early Head Start-Child Care Partnership (EHS-CCP) program.

DHS 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.

All DHS Head Start requirements, including staff-student ratio, must be met during the designated Head Start service hours, and/or when a child is received by a Head Start or Early Head Start staff member or signed into a Head Start or Early Head Start classroom by a parent/guardian, school personnel, bus driver/aide, or other caregiver at any point in time during the day.

**Reference:** 1302.21

	<b>DHS Head Start Program Policy</b>		
<b>TRANSPORTATION 1</b>			
<b>SUBJECT</b>	General Requirements		
<b>REFERENCE</b>	Transportation		
<b>EFFECTIVE</b>	4/21/2016		
<b>Policy Council Approval: 7/25/17</b>	<b>Policy Council Revision: 7/25/17</b>	<b>Governing Body Approval: 9/28/17</b>	<b>Governing Body Revision: 9/28/17</b>
<b>PAGE: 1 of 1</b>			

**Policy:**



Education Service Providers will develop and implement procedures to ensure the safe operations of vehicles used to transport children enrolled in the City of San Antonio Department of Human Services Head Start Program, including during field trips. These procedures must include:

- Provisions for emergency and safety equipment on board
- Vehicle maintenance
- Training and documentation of bus staff on emergency and safety procedures
- Trip routing
- Pick up and drop off children to and from campus
- Release of a child to designated adult

**Performance Standard(s):**

1303.71; 1303.72; 1303.73



	<b>DHS Head Start Program Policy</b>		
<b>TRANSPORTATION 1</b>			
<b>SUBJECT</b>	General Requirements		
<b>REFERENCE</b>	Transportation		
<b>EFFECTIVE</b>	4/21/2016		
<b>Policy Council Approval: 7/25/17</b>	<b>Policy Council Revision: 7/25/17</b>	<b>Governing Body Approval: 9/28/17</b>	<b>Governing Body Revision: 9/28/17</b>
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**Performance Standard(s):**

1303.71; 1303.72; 1303.73

	<b>DHS Head Start Program Policy</b>		
<b>TRANSPORTATION 3</b>			
<b>SUBJECT</b>	Child Restraint Systems & Bus Monitor		
<b>REFERENCE</b>	Transportation		
<b>EFFECTIVE</b>	4/21/2016		
<b>Policy Council Approval: 7/25/17</b>	<b>Policy Council Revision: 7/25/17</b>	<b>Governing Body Approval: 9/28/17</b>	<b>Governing Body Revision: 9/28/17</b>
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**Policy:**

The City of San Antonio Department of Human Services Head Start Program provides transportation services through the established partnership with Edgewood ISD and San Antonio ISD students that live more than two miles from their assigned home campus, qualify through McKinney-Vento Services or IDEA, or attend an early childhood center.



The Education Service Providers provide Head Start transportation services, including field trips, and must ensure that each vehicle used to transport children enrolled in the Head Start Program is equipped with height and weight-appropriate child safety restraint systems and includes a bus monitor.

If the Education Service Providers are unable to provide child safety restraint systems and a bus monitor for any vehicle used to transport any child enrolled in the Head Start Program, the City of San Antonio Department of Human Services Head Start Program will request a Transportation Waiver from the Office of Head Start.

Education Service Providers must notify the City of San Antonio Department of Human Services Head Start Program Administrator, or designated staff member, by April 1 if they are unable to meet the safety restraint and bus monitor requirements for the upcoming school year.

**Performance Standards:**

1303.70; 1303.71

	<b>DHS Head Start Program Policy</b>			
<b>TRANSPORTATION 3</b>				
<b>SUBJECT</b>	Child Restraint Systems <u>&amp; Bus Monitor</u>			
<b>REFERENCE</b>	Transportation			
<b>EFFECTIVE</b>	4/21/2016			
<b>Policy Council Approval: 7/25/17</b>	<b>Policy Council Revision: 7/25/17</b>	<b>Governing Body Approval: 9/28/17</b>	<b>Governing Body Revision: 9/28/17</b>	
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**Performance Standards:**

1303.70; 1303.71

# Early Head Start

**2024-2025 Early Head Start Policy Index**

		Change Required?	Description of Change made to current Policy
<b>Disabilities</b>			
1	Individualized Education Program (IEP) for Children with Disabilities	Yes	Increased days to review IFSP with Service Providers from 10 to 15
3	Children With Developmental Delays Who Do Not Qualify for Special Education Services	Yes	Added with parent/guardian consent for ECI re evaluation
<b>Education and Early Childhood Development</b>			
1	Home Visits/ Parent Conferences	Yes	Clarification regarding home visits and parent conferences.
11	Discipline and Guidance	Yes	Additional guidance related discipline and guidance.
<b>Environmental Health and Safety</b>			
2	Class and Group Size Requirements	Yes	Clarified policy to only include information related to class size requirements.
8	Staffing and Supervision	Yes	Name Change - Added staffing requirements from Environmental Health & Safety Policy 2.
<b>Health Services</b>			
1	Immunization Requirements	Yes	Removed CDC and added State Vaccine REquirments for Child-Care, updated HSPS in reference section
<b>Home Based</b>			
3	Home Visitor's Caseloads	Yes	Reduced caseload number from 12 families to 8 children.
<b>Program Design and Management (PDM)</b>			
2	Standards of Conduct	Yes	Added language for Standards of Conduct to be reviewed annually and documentaion kept in staff file.
9	Critical Incident Reporting	Yes	Provided additional guidance related to reporting requirements.
10	Personnel	Yes	Provided additional guidance related to reporting new hire information.
11	Program Governance	Yes	Provided additional guidance related to new procedure regarding what is shared with the Head Start Policy Council and Advisory Committee.
18	Program Data- Access and Security	Yes	Clarification regarding communication and confidentiality.
19	Management of Program Data	Yes	Clarification regarding communication and confidentiality.
21	Responsibility of fees related to injuries	New	New policy related to medical bills.
22	Program Services	New	New policy after revising Enviornmental Health & Safety Policy 2 and clarification on services and hours.

	<b>DHS Early Head Start Program Policy</b>		
<b>DISABILITIES 1</b>			
<b>SUBJECT</b>	Individualized Family Service Plan (IFSP) for Children with Delays/Disabilities		
<b>REFERENCE</b>	Disabilities Services		
<b>EFFECTIVE</b>	8/1/2016		
<b>Policy Council Approval: 7/26/16</b>	<b>Policy Council Revision: 5/23/23</b>	<b>Governing Body Approval: 9/19/16</b>	<b>Governing Body Revision: 6/15/23</b>
<b>PAGE: 1 of 1</b>			

**Policy:**

The Individualization policy guidelines in Education 3 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 of San Antonio 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 of San Antonio staff will coordinate with Service Providers to review the IFSP within 150 business days of a child's first day of attendance or first home visit for children enrolled in the home-based program.

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 ChildPlus 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

	<b>DHS Early Head Start Program Policy</b>		
<b>DISABILITIES 1</b>			
<b>SUBJECT</b>	Individualized Family Service Plan (IFSP) for Children with Delays/Disabilities		
<b>REFERENCE</b>	Disabilities Services		
<b>EFFECTIVE</b>	8/1/2016		
<b>Policy Council Approval: 7/26/16</b>	<b>Policy Council Revision: 5/23/23</b>	<b>Governing Body Approval: 9/19/16</b>	<b>Governing Body Revision: 6/15/23</b>
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**Performance Standard(s):**

1302.61; 1302.62; 1302.63; 1303.75

	<b>DHS Early Head Start Program Policy</b>		
<b>DISABILITIES 3</b>			
<b>SUBJECT</b>	Children with developmental delays who do not qualify for Part C Services		
<b>REFERENCE</b>	Disability Services		
<b>EFFECTIVE</b>	8/1/2016		
<b>Policy Council Approval: 7/26/16</b>	<b>Policy Council Revision: 5/23/23</b>	<b>Governing Body Approval: 9/19/16</b>	<b>Governing Body Revision: 6/15/23</b>
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**Policy:**



Early Head Start (EHS), Service Providers will serve children with suspected or diagnosed delays/disabilities who do not qualify for Part C services from the local Early Childhood Intervention Programs (ECI).

City of San Antonio Staff and teachers will work with parents to identify the child's strengths, needs and interests and develop and implement strategies to ensure positive student outcomes. City of San Antonio Staff and teachers will monitor the child's progress. If a child does not exhibit progress while in the EHS Program, a request for re-evaluation may be submitted to an ECI Program with parent/guardian consent.

**Performance Standard(s):**

1302.31; 1302.33; 1302.41; 1302.46; 1302.43 (d) (1-2); 1302.62 (a)



	<b>DHS Early Head Start Program Policy</b>		 <b>HEAD START</b> City of San Antonio Department of Human Services
<b>DISABILITIES 3</b>			
<b>SUBJECT</b>	Children with developmental delays who do not qualify for Part C Services		
<b>REFERENCE</b>	Disability Services		
<b>EFFECTIVE</b>	8/1/2016		
<b>Policy Council Approval: 7/26/16</b>	<b>Policy Council Revision: 5/23/23</b>	<b>Governing Body Approval: 9/19/16</b>	<b>Governing Body Revision: 6/15/23</b>
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1302.31; 1302.33; 1302.41; 1302.46; 1302.43 (d) (1-2); 1302.62 (a)

	<b>DHS Early Head Start Program Policy</b>		
<b>EDUCATION 1</b>			
<b>SUBJECT</b>	Home Visits/Parent Conferences		
<b>REFERENCE</b>	Education and Early Childhood Development		
<b>EFFECTIVE</b>	8/1/2016		
<b>Policy Council Approval:</b> 7/26/16	<b>Policy Council Revision:</b> 5/23/23	<b>Governing Body Approval:</b> 9/19/16	<b>Governing Body Revision:</b> 6/15/23
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**Policy:**

Early Head Start (EHS) teachers must complete two Home Visits and ~~no less than~~ two Parent/Teacher Conferences each program year for center-based services.

A system must be in place to ensure that completion dates of the Home Visits and Parent/Teacher Conferences are entered into *Child Plus and meet the City of the San Antonio Benchmark Due Date Guide*, the *EHS File Scan Order and Process Guide*, and *applicable ChildPlus Data Entry Guide*.

Documentation of the Home Visit and Parent/Teacher Conference must be maintained in the child file and ChildPlus. If a Home Visit or Parent/Teacher Conference did not occur, documentation regarding why the event did not occur must be noted in Child Plus.

The first Home Visit may be completed by the teacher no more than 14 calendar days prior to the first day of a child's entry into the program. If a child enters the program after January 31<sup>st</sup>, a minimum of one home visit and one Parent/Teacher Conference must be completed by the last day of the program year. If a child's date of entry is within 45 calendar days of the Parent/Teacher Conference benchmark due date, then the teacher must complete the Home Visit but is not required to complete both the Home Visit and the Parent Conference.

[Home Visits and Parent/Teacher Conferences cannot be conducted on the same date. Dates should be scheduled at intervals to allow for student growth, progress, and meaningful conversations.](#)

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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 convenience and completed in the home or at a mutually agreed upon location, upon parent/guardian's request.

Home Visits and Parent/Teacher Conferences offer opportunities for parents/guardians and staff to share knowledge related to the strengths, needs, interests, goals, and concerns of the child and program activities. During the Home Visits and Parent/Teacher Conferences the teacher will share work samples, educational assessment outcomes, screening information, and information regarding the transition into a PreK/Head Start program, when applicable.

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

**Performance Standard:**

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

	<b>DHS Early Head Start Program Policy</b>		
<b>EDUCATION 1</b>			
<b>SUBJECT</b>	Home Visits/Parent Conferences		
<b>REFERENCE</b>	Education and Early Childhood Development		
<b>EFFECTIVE</b>	8/1/2016		
<b>Policy Council Approval:</b> 7/26/16	<b>Policy Council Revision:</b> 5/23/23	<b>Governing Body Approval:</b> 9/19/16	<b>Governing Body Revision:</b> 6/15/23
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**Performance Standard:**

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

	<b>DHS Early Head Start Program Policy</b>		
<b>EDUCATION 11</b>			
<b>SUBJECT</b>	Discipline and Guidance		
<b>REFERENCE</b>	Education and Early Childhood Development		
<b>EFFECTIVE</b>	8/1/2016		
<b>Policy Council Approval: 7/26/16</b>	<b>Policy Council Revision: 5/23/23</b>	<b>Governing Body Approval: 9/19/16</b>	<b>Governing Body Revision: 6/15/23</b>
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### Policy:

Service Providers must establish discipline and guidance policies and procedures appropriate for infants and toddlers. A copy must be provided to all parents/guardians, staff, volunteers, substitute ~~floaters~~floaters, teachers, and contractors. Documentation must be maintained showing receipt of the written discipline and guidance policies. Service Providers must ensure a signed copy of the Education 11 Discipline and Guidance policy is maintained in all employees, ~~volunteer~~volunteers, home ~~visitors~~visitors, and substitutes~~s~~s, floaters~~s~~s, teachers~~s~~s files.

The policies and procedures must include positive methods of discipline and guidance that build self-esteem and support self-control and self-regulation such as:

- Praise and encouragement of developmentally appropriate behavior instead of focusing only on the unacceptable behavior
- Frequent reminders of behavior expectations using clear and positive statements
- Redirection of behavior using positive statements

Discipline must be constructive, individualized, and consistent for each child, appropriate to the child's level of understanding, and directed toward teaching the child appropriate behavior. Service Provider must prohibit or severely~~ally~~ely limit the use of suspension due to a child's behavior. Service Provider must not expel or un-enroll a child from Head Start due to a child's behavior, unless approved by the Head Start Administrator.

The policies and procedures must also include guidance on appropriate communication with parents/guardians regarding a child's behavior.

When appropriate for the child's age and development, a brief supervised separation or time away from the group may be necessary and should be limited to no more than one minute per year of the child's age. There must be no harsh, cruel or unusual treatment of any child. The following examples are prohibited:



- Corporal punishment or threats of corporal punishment
- Punishment associated with food, naps, toilet training

- Pinching, shaking, or biting a child
- Hitting a child with hand or an object
- Putting anything in or on a child's mouth
- Humiliating, ridiculing, rejecting, or yelling at a child
- Pointing a finger in a child's face
- Snapping fingers at a child
- Use of isolation to discipline a child
- Binding or tying a child to restrict movement
- Threatening phrases/tone or sarcastic language/tone
- Threatening to call a child's parent/guardian related to behavior
- Subjecting a child to harsh, abusive, or profane language
- Placing a child in a locked or dark room, bathroom, or closet with the door closed
- Requiring a child to remain silent or inactive for inappropriately long periods of time for the child's age including requiring a child to remain in a restrictive device
- Child restraint performed by staff not certified in proper restraint procedures
- Withholding outdoor free play
- Requiring a parent/guardian to pick up a child due to misbehavior

**Performance Standard(s):**

1302.17; 1302.90 (c); 1302.31 (e) (2-4)



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<b>EDUCATION 11</b>			
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<b>REFERENCE</b>	Education and Early Childhood Development		
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- Putting anything in or on a child's mouth
- Humiliating, ridiculing, rejecting, or yelling at a child
- Pointing a finger in a child's face
- Snapping fingers at a child
- Use of isolation to discipline a child
- Binding or tying a child to restrict movement
- Threatening phrases/tone or sarcastic language/tone
- Threatening to call a child's parent/guardian related to behavior
- Subjecting a child to harsh, abusive, or profane language
- Placing a child in a locked or dark room, bathroom, or closet with the door closed
- Requiring a child to remain silent or inactive for inappropriately long periods of time for the child's age including requiring a child to remain in a restrictive device
- Child restraint performed by staff not certified in proper restraint procedures
- Withholding outdoor free play
- Requiring a parent/guardian to pick up a child due to misbehavior

**Performance Standard(s):**

1302.17; 1302.90 (c); 1302.31 (e) (2-4)

	<b>DHS Early Head Start Program Policy</b>		
<b>ENVIRONMENTAL HEALTH AND SAFETY 2</b>			
<b>SUBJECT</b>	<del>Staffing and</del> Class <u>and Group</u> Size Requirements		
<b>REFERENCE</b>	Environmental Health and Safety		
<b>EFFECTIVE</b>	8/1/2016		
<b>Policy Council Approval: 7/26/16</b>	<b>Policy Council Revision: 5/23/23</b>	<b>Governing Body Approval: 9/19/16</b>	<b>Governing Body Revision: 6/15/23</b>
<b>PAGE: 1 of 2</b>			

#### Policy:

~~Early Head Start (EHS) Program, Service Providers will ensure that EHS classes are designed with no more than eight children and staffed by two paid teachers. It is recommended, whenever possible, that a third person be in the classroom, such as a volunteer.~~

The Early Head Start classroom sizes are determined based on square footage, with a minimum of 35 square feet per child indoor and 75 square feet per child for outdoor with no more than 8 children to a classroom.

#### Classroom Design

Ages	Classroom Design
6 Wks -36 Months	All EHS classrooms, by design, will have no more than eight children enrolled per class. The integration of EHS enrolled children and non EHS children per classroom is encouraged.

#### Group Size

Ages	Group Size
6 Wks -36 Months	Maximum of eight children enrolled per class. Two teachers with no more than eight children. Two teachers must be in the classroom at all times.

#### Ratios

Ages	Ratios
6 Wks -36 Months	One teacher to four children with two teachers in the classroom at all times.

~~Class sizes are determined based on square footage, with a minimum of 35 square feet/child.~~

Service Providers must seek prior approval before any change to a classroom age group designation. As children age throughout the program, they may remain in their current classrooms until room becomes available in the next age-appropriate classroom.

~~Classroom management entails both teachers meeting the needs of all children. However, Service Providers must ensure that each teacher working exclusively with infants and toddlers has the responsibility for no more than four infants and toddlers when meeting home visits, parent/teacher conference expectations and developmental needs of the children. All EHS sites must comply with the above stated staffing, group and class size requirements.~~

~~Ratios must be maintained during EHS hours. Program hours vary by site and are set and approved at the beginning of the program year as part of the EHS Program Design.~~

~~In extreme emergencies, should a center become short staffed and unable to meet the EHS ratios and group size, they must follow the Texas Child Care Regulation Minimum Standards and seek approval from DHS EHS Senior Management. This practice is the exception and not the norm. Centers must report when being understaffed.~~



~~Ratios must be maintained during EHS hours. Program hours vary by site and are set and approved at the beginning of the program year as part of the EHS Program Design.~~

#### **Volunteers being counted in classroom ratios**

~~A volunteer may be used to supplement the required adult/child ratio only for short periods of time, 10-15 minutes to accommodate for unscheduled interruptions/emergencies. Volunteers may be used to supplement for restroom breaks, children's needs, and to cover lunch hours as long as a qualified EHS teacher is in the classroom. **A volunteer must never be left alone with a child or group of children and must always remain with a qualified EHS teacher.** All volunteers must sign the Head Start Standards of Conduct, pass a background check, and receive volunteer training. Providers must keep documentation of volunteer training and comply with the Texas Health and Human Services Commission Child Care Regulations.~~

#### **Performance Standard(s):**

1302.21(b)(1)(2); 1302.94(a)(b)

	<b>DHS Early Head Start Program Policy</b>		
<b>ENVIRONMENTAL HEALTH AND SAFETY 2</b>			
<b>SUBJECT</b>	Class and Group Size Requirements		
<b>REFERENCE</b>	Environmental Health and Safety		
<b>EFFECTIVE</b>	8/1/2016		
<b>Policy Council Approval: 7/26/16</b>	<b>Policy Council Revision: 5/23/23</b>	<b>Governing Body Approval: 9/19/16</b>	<b>Governing Body Revision: 6/15/23</b>
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### Performance Standard(s):

1302.21(b)(1)(2);

1302.94(a)(b)

	<b>DHS Early Head Start Program Policy</b>		
<b>ENVIRONMENTAL HEALTH AND SAFETY <u>82</u></b>			
<b>SUBJECT</b>	Staffing <u>and Supervision</u> <del>and Class Size Requirements</del>		
<b>REFERENCE</b>	Environmental Health and Safety		
<b>EFFECTIVE</b>	8/1/2016		
<b>Policy Council Approval: 7/26/16</b>	<b>Policy Council Revision: 5/23/23</b>	<b>Governing Body Approval: 9/19/16</b>	<b>Governing Body Revision: 6/15/23</b>
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Ratios must be maintained during EHS hours. Program hours vary by site and are set and approved at the beginning of the program year as part of the EHS Program Design.

In extreme emergencies, should a center become short staffed and unable to meet the EHS ratios and group size, they must follow the Texas Child Care Regulation Minimum Standards and seek approval from DHS EHS Senior Management. This practice is the exception and not the norm. Centers must report when being understaffed.

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Service Providers will develop and implement active supervision procedures. No child will be left alone or unsupervised for any period of time.



#### **Volunteers being counted in classroom ratios**

A volunteer may be used to supplement the required adult/child ratio only for short periods of time, 10-15 minutes to accommodate for unscheduled interruptions/emergencies. Volunteers may be used to supplement for restroom breaks, children's needs, and to cover lunch hours as long as a qualified EHS teacher is in the classroom. **A volunteer must never be left alone with a child or group of children and must always remain with a qualified EHS teacher.** All volunteers must sign the Head Start Standards of Conduct, pass a background check, and receive volunteer training. Providers must keep documentation of volunteer training and comply with the Texas Health and Human Services Commission Child-Care Regulations.

#### **Performance Standard(s):**

1302.21(b)(1)(2); 1302.94(a)(b); 1302.47 (b){2}{iii}; 1302.47(b){S}{i}; 1302.47(b) (S){iii}; 1302.94(b)



	<b>DHS Early Head Start Program Policy</b>		
<b>ENVIRONMENTAL HEALTH AND SAFETY 8</b>			
<b>SUBJECT</b>	Staffing and Supervision		
<b>REFERENCE</b>	Environmental Health and Safety		
<b>EFFECTIVE</b>	8/1/2016		
<b>Policy Council Approval: 7/26/16</b>	<b>Policy Council Revision: 5/23/23</b>	<b>Governing Body Approval: 9/19/16</b>	<b>Governing Body Revision: 6/15/23</b>
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**Performance Standard(s):**

1302.21(b)(1)(2); 1302.94(a)(b); 1302.47 (b){2}{iii}; 1302.47(b){S}{i}; 1302.47(b) (S){iii}; 1302.94(b)

	<b>DHS Early Head Start Program Policy</b>		
<b>HEALTH</b> <b>1</b>			
<b>SUBJECT</b>	Immunization Requirements		
<b>REFERENCE</b>	Comprehensive Health Services		
<b>EFFECTIVE</b>	8/1/2016		
<b>Policy Council Approval: 7/26/16</b>	<b>Policy Council Revision: 5/23/23</b>	<b>Governing Body Approval: 9/19/16</b>	<b>Governing Body Revision: 6/15/23</b>
<b>PAGE: 1 of 1</b>			

**Policy:**

Early Head Start (EHS) Program Service Provider staff will ensure that all children are up to date with the current immunization recommendations issued by the C Texas Health and Human Services's Minimum State Vaccine Requirements for Child-Care in accordance with the Texas Administrative Code (TAC), and ChildCare Regulations. If a center- based child is not up to date with minimum immunization requirements, the child may be excluded from attendance, but not unenrolled from the EHS Program.

Immunization recommendations issued by the Center for Disease Control (CDC) will be considered based on prevalent community health problems.

All immunization records received by EHS staff will be scanned into ChildPlus according to the EHS *Program ChildPlus Scan Order and Process Guide* and the applicable Child Plus Data Entry Guide. Current immunization records will be kept on file with the Service Provider.

Staff will work with the family to ensure that the child is up to date with the recommended immunization schedule and will document all efforts and outcomes in Child Plus.

**Immunization Exemption:**

Chapter §97 Subchapter B of the Texas Administrative Code (TAC) describes the conditions under which individuals can seek exemptions from Texas immunization requirements. Exemption information and instructions can be obtained through the Texas Department of State Health Services.

Once the State process for exemptions is completed, documentation will be attached in Child Plus and kept on file with the Service Provider.



**Performance Standard:**

1302.15(e)

1302.42

**Reference:**

[Texas Minimum State Vaccine Requirements for Child-Care and Pre-K Facilities,](#)  
[TAC 97 Immunization Requirements,](#) CDC Immunization Schedule

	<b>DHS Early Head Start Program Policy</b>		
<b>HEALTH 1</b>			
<b>SUBJECT</b>	Immunization Requirements		
<b>REFERENCE</b>	Comprehensive Health Services		
<b>EFFECTIVE</b>	8/1/2016		
<b>Policy Council Approval: 7/26/16</b>	<b>Policy Council Revision: 5/23/23</b>	<b>Governing Body Approval: 9/19/16</b>	<b>Governing Body Revision: 6/15/23</b>
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1302.15(e)

1302.42

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	<b>DHS Early Head Start Program Policy</b>		
<b>HOME-BASED 3</b>			
<b>SUBJECT</b>	Home Visitor’s Caseloads		
<b>REFERENCE</b>	Home-Based Option		
<b>EFFECTIVE</b>	10/1/2020		
<b>Policy Council Approval: 9/22/20</b>	<b>Policy Council Revision: 9/22/20</b>	<b>Governing Body Approval: 11/12/20</b>	<b>Governing Body Revision: 11/12/20</b>
<b>PAGE: 1 of 1</b>			

**Policy:**

The Early Head Start (EHS) Program Service Provider Home-based option must not exceed a caseload of ~~12 families~~ 8 children for ~~any individual~~ the home visitor.

**Performance Standard:**

1302.22 (b)

	<b>DHS Early Head Start Program Policy</b>		
<b>HOME-BASED 3</b>			
<b>SUBJECT</b>	Home Visitor’s Caseloads		
<b>REFERENCE</b>	Home-Based Option		
<b>EFFECTIVE</b>	10/1/2020		
<b>Policy Council Approval: 9/22/20</b>	<b>Policy Council Revision: 9/22/20</b>	<b>Governing Body Approval: 11/12/20</b>	<b>Governing Body Revision: 11/12/20</b>
<b>PAGE: 1 of 1</b>			



**Policy:**

The Early Head Start (EHS) Program Service Provider Home-based option must not exceed a caseload of 8 children for the home visitor.

**Performance Standard:**

1302.22 (b)



	<b>DHS Early Head Start Program Policy</b>		
<b>PDM 2</b>			
<b>SUBJECT</b>	Standards of Conduct		
<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: 5/25/22</b>	<b>Governing Body Approval: 9/19/16</b>	<b>Governing Body Revision: 8/4/22</b>
<b>PAGE: 1 of 2</b>			

**Policy:**

The Head Start Program staff, including Early Head Start, substitutes, consultants, contractors, and volunteers must abide by the program's Standards of Conduct that:

- a. Ensure staff, consultants, contractors, and volunteers implement positive strategies to support children's well-being and prevent and address challenging behavior;
- b. Ensure staff, including substitutes, consultants, contractors, and volunteers do not maltreat or endanger the health or safety of children, including, at a minimum, that staff must not:
  - i. Use corporal punishment;
  - ii. Use isolation to discipline a child;
  - iii. Bind or tie a child to restrict movement or tape a child's mouth;
  - iv. Use or withhold food as a punishment or reward;
  - v. Use toilet learning/training methods that punish, demean, or humiliate a child;
  - vi. Use any form of emotional abuse, including public or private humiliation, rejecting, terrorizing, extended ignoring, or corrupting a child;
  - vii. Physically abuse a child;
  - viii. Use any form of verbal abuse, including profane, sarcastic language, threats, or derogatory remarks about the child or child's family; or,
  - ix. Use physical activity or outdoor time as a punishment or reward;
- c. Ensure staff, including substitutes, consultants, contractors, and volunteers respect and promote the unique identity of each child and family and do not stereotype on any basis, including gender, race, ethnicity, culture, religion, disability, sexual orientation, or family composition;
- ed. Ensure the program's Standards of Conduct are reviewed and signed by staff, including substitutes, consultant, contractors, and volunteers annually. Documentation must be maintained in all staff files.



de Require staff, including substitutes, consultants, contractors, and volunteers to comply with program confidentiality policies concerning personally identifiable information (PII) about children, families, and other staff members in accordance with subpart C of part 1303 and applicable federal, state, local, and tribal laws; and,

ef. Ensure no child is left alone or unsupervised by staff, consultants, contractors, or volunteers while under their care.

Furthermore, all staff, consultants, contractors, volunteers, Head Start Policy Council members, and Advisory Committee members are required to sign a Standards of Conduct form. The Head Start Program will implement appropriate penalties including termination of staff, consultants, and volunteers who violate the Standards of Conduct.

**Performance Standard(s):**

1302.90(c)(1); 1303(C)

	<b>DHS Early Head Start Program Policy</b>		
<b>PDM 2</b>			
<b>SUBJECT</b>	Standards of Conduct		
<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: 5/25/22</b>	<b>Governing Body Approval: 9/19/16</b>	<b>Governing Body Revision: 8/4/22</b>
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- d. Ensure the program's Standards of Conduct are reviewed and signed by staff, including substitutes, consultant, contractors, and volunteers annually. Documentation must be maintained in all staff files.

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**Performance Standard(s):**

1302.90(c)(1); 1303(C)

	<b>DHS Early Head Start Program Policy</b>		
<b>PDM 9</b>			
<b>SUBJECT</b>	Critical Incident Reporting		
<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: 5/23/23</b>	<b>Governing Body Approval: 9/19/16</b>	<b>Governing Body Revision: 6/15/23</b>
<b>PAGE: 1 of 1</b>			

**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/neglect which may or may not have occurred during service hours.
- Allegations of child abuse/neglect or maltreatment against any EHS staff member, volunteer, consultant and contractor, including, but not limited to grabbing, shoving, shaking, swatting, or dragging a child; spanking or any other type of corporal or physical punishment; binding tying, or taping a child; terrorizing a child with threats or menacing acts; or any form of sexual contact.
- Incidents which may have placed a child, family member or staff in danger.
- Any incident where a child is left unsupervised while in the care or under the supervision of program staff, which includes leaving a child alone anywhere on the grounds of an EHS center (e.g., in a classroom, bathroom, on a playground), as well as outside the facility in a parking lot, or on a nearby street.
- Any incident that involves a classroom that is out of ratio. ~~Any situation that involves a classroom out of ratio must be reported.~~
- Inappropriate discipline, which is any type of conduct used to instill fear or humiliate rather than to educate a child, such as poking or pinching a child; making fun of or laughing about a child; using/withholding food or an activity as a punishment or reward; or isolating a child.
- Health incidents and illnesses, which include, but are not limited to:
  - Injuries that require urgent medical attention by a health-care

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professional, such as a broken bone; a severe sprain; chipped or cracked teeth; head trauma; deep cuts; contusions or lacerations; or animal bites.

- Child or staff member leaving by emergency medical transport

 Any reportable disease/illness, as indicated by the Centers for Disease Control and Prevention, State of Texas, State of Texas Child Care Regulations, or the City of San Antonio Metro Health Department.

- Child receiving outside medical attention at any point in time for an injury sustained during EHS program hours

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- Unauthorized release where a child is released from an EHS center to a person without the permission or authorization of a parent or legal guardian and whose identity had not been verified by photo identification.
- 
- 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
- 

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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)

**Information Memorandum:**

ACF-IM-HS-22-07



	<b>DHS Early Head Start Program Policy</b>		
<b>PDM 9</b>			
<b>SUBJECT</b>	Critical Incident Reporting		
<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: 5/23/23</b>	<b>Governing Body Approval: 9/19/16</b>	<b>Governing Body Revision: 6/15/23</b>
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  - Child or staff member leaving by emergency medical transport
- Any reportable disease/illness, as indicated by the Centers for Disease Control and Prevention, State of Texas, State of Texas Child Care Regulations, or the City of San Antonio Metro Health Department
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- 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)

**Information Memorandum:**

ACF-IM-HS-22-07

	<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>	
<b>PAGE: 1 of 2</b>				

**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.

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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

	<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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- 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.
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**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

	<b>DHS Early Head Start Program Policy</b>		
<b>PDM 11</b>			
<b>SUBJECT</b>	Program Governance		
<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: 4/23/19</b>	<b>Governing Body Approval: 9/19/16</b>	<b>Governing Body Revision: 5/23/19</b>
<b>PAGE: 1 of 1</b>			

**Policy:**

The Head Start Program, including Early Head Start (EHS), has established a formal structure for program governance that includes the City of San Antonio City Council as the Governing Body, and the Head Start Policy Council. City Council has the legal and fiscal responsibility to administer and oversee the Head Start and Early Head Start programs and has authorized a subcommittee to oversee key responsibilities related to program governance and improvements of the Head Start programs. The Head Start Policy Council allows for parent participation in policy making and other decisions about the program, as required by the Head Start Program Performance Standards and Section 642 (c) of the Head Start act.

The City of San Antonio Head Start Program will develop and implement procedures related to information reported to the Head Start Policy Council (HSPC) and program governance advisory committees.



In addition, the Head Start Program will establish parent committees exclusively of parents of currently enrolled children to advise staff and communicate with the Policy Council.

**Performance Standard:**

1301

**Head Start Act:**

Sec. 642(c)(1)(E)(iv)(XI) and Sec. 642 (c) (2)

	<b>DHS Early Head Start Program Policy</b>		
<b>PDM 11</b>			
<b>SUBJECT</b>	Program Governance		
<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: 4/23/19</b>	<b>Governing Body Approval: 9/19/16</b>	<b>Governing Body Revision: 5/23/19</b>
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**Performance Standard:**

1301

**Head Start Act:**

Sec. 642(c)(1)(E)(iv)(XI) and Sec. 642 (c) (2)



	<b>DHS Early Head Start Program Policy</b>			
<b>PDM 18</b>				
<b>SUBJECT</b>	Program Data – Access and Security			
<b>REFERENCE</b>	Program Design and Management			
<b>EFFECTIVE</b>	4/23/18			
<b>Policy Council Approval: 1/22/19</b>	<b>Policy Council Revision: 5/23/23</b>	<b>Governing Body Approval: 2/28/19</b>	<b>Governing Body Revision: 6/15/23</b>	
<b>PAGE: 1 of 3</b>				

**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 grant or anyone who works with children or families enrolled in the Head Start or EHS 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 Health Insurance Portability and Accountability Act of 1996 (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 and information from unauthorized access, acquisition, or disclosure. Staff that share PHI, PII and IDEA part B and C electronically must follow encryption guidelines and ensure the receiving entity is an authorized recipient of the specific data being delivered.

To ensure data protection, confidentiality, and to safeguard PHI, PII, and adhere to HIPAA, FERPA, and the Individuals with Disabilities Education Act (IDEA) Part B and C data, program staff should utilize a child or parent/guardian's ChildPlus ID and initials when communicating via email, TEAMS, or other electronic messaging system.

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Staff may request parents/guardians to provide documents that contain PHI or PII via the secure ChildPlus Request Document feature.

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

Staff ensures the environment in which they are working is secure, should include the use of privacy screen filters, and that only authorized persons are within viewing distance of the authorized user's screen and/or confidential documents.

All devices (e.g., laptops and phones) must have auto-lock enabled with a maximum timeout of 15 minutes. Staff are encouraged to lock their workstations manually when leaving their desk (Windows key + L or CTRL+ALT+DEL).

Disclosure of 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 Security Awareness Training
- HIPPA Training



Completion of these trainings are documented and maintained by the City of San Antonio Human Resources Department and/or the Training and Technical Assistance Team.

All DHS Head Start staff must review and acknowledge the 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)

	<b>DHS Early Head Start Program Policy</b>		
<b>PDM 18</b>			
<b>SUBJECT</b>	Program Data – Access and Security		
<b>REFERENCE</b>	Program Design and Management		
<b>EFFECTIVE</b>	4/23/18		
<b>Policy Council Approval: 1/22/19</b>	<b>Policy Council Revision: 5/23/23</b>	<b>Governing Body Approval: 2/28/19</b>	<b>Governing Body Revision: 6/15/23</b>
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**Performance Standards:**

1302.101(b)(4)

	<b>DHS Early Head Start Program Policy</b>		
<b>PDM 19</b>			
<b>SUBJECT</b>	Management of Program Data		
<b>REFERENCE</b>	Program Design and Management		
<b>EFFECTIVE</b>	4/23/18		
<b>Policy Council Approval: 1/22/19</b>	<b>Policy Council Revision: 5/23/23</b>	<b>Governing Body Approval: 2/28/19</b>	<b>Governing Body Revision: 6/15/23</b>
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- Only computers and/or devices configured by the Information Technology (IT) Department for use on the CoSA network or Education Service Provider 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 and staff should use a privacy screen for all monitors and laptop screens.-



- 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.
- All devices (e.g., laptops and phones) must have auto-lock enabled with a maximum timeout of 15 minutes. Staff are encouraged to lock their workstations manually when leaving their desk (Windows key + L or CTRL+ALT+DEL).
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- 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.
- Staff should not request PHI, PII, and/or IDEA Part B and C data via text or email. Staff may request parents/guardians to provide documents that contain this information via the secure ChildPlus Request Document feature.

#### 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.

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- HIPAA Training

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<b>PDM 19</b>			
<b>SUBJECT</b>	Management of Program Data		
<b>REFERENCE</b>	Program Design and Management		
<b>EFFECTIVE</b>	4/23/18		
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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)

	<b>DHS Early Head Start Program Policy</b>		
<b>PDM 21</b>			
<b>SUBJECT</b>	Responsibility of fees related to injuries		
<b>REFERENCE</b>	Program Design and Management		
<b>EFFECTIVE</b>	05/2024		
<b>Policy Council Approval:</b>	<b>Policy Council Revision:</b>	<b>Governing Body Approval:</b>	<b>Governing Body Revision:</b>
<b>PAGE: 1 of 1</b>			

**Policy:**

The City of San Antonio is not responsible to pay medical bills, including ambulance fees, related to an injury sustained by a child, or their parent/guardian, enrolled in the City of San Antonio Department of Human Services Head Start Program (DHS Head Start). The City of San Antonio is a political subdivision of the State of Texas and subject to the Texas Tort Claims Act (Tex. Civ. Prac. & Rem. Code, Section 101.001, et. seq.), with limited liability.



Service Providers must ensure information related to liability and injuries sustained while on site or participating in services are available to parents/guardians with a child or children enrolled in the program. If a parent/guardian with a child enrolled in the DHS Head Start Program has a claim against the City of San Antonio, they may submit the claim to the Office of Risk Management at <https://www.sanantonio.gov/RiskManagement/Claims-Administration>

If a City of San Antonio Staff Member sustains an injury during work hours, regardless of location of the accident, they must contact their supervisor, submit an accident report, and follow the requirements outlined in Administrative Directive 4.84.

Any staff member employed by the Service Provider must follow the established school district and childcare center policies and procedures related to accidents and injuries.

**Reference:**

Texas Torts Claims Act, City of San Antonio Administrative Directive 4.84; [City of San Antonio Risk Management](#)

	<b>DHS Early Head Start Program Policy</b>		
<b>PDM 22</b>			
<b>SUBJECT</b>	Head Start Program Services		
<b>REFERENCE</b>	Program Design and Management		
<b>EFFECTIVE</b>	05/2024		
<b>Policy Council Approval:</b>	<b>Policy Council Revision:</b>	<b>Governing Body Approval:</b>	<b>Governing Body Revision:</b>
<b>PAGE: 1 of 1</b>			

**Policy:**

Each program year, the City of San Antonio Department of Human Services Head Start Program (DHS Head Start) provides a minimum of 1,020 hours of planned class operations for the Head Start (HS) Prekindergarten Program, 1,380 hours of planned class operations for the Early Head Start (EHS) center-based program, and a 10-hour day for 240 days of planned class operations for the Early Head Start-Child Care Partnership (EHS-CCP) program.

DHS 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.

All DHS Head Start requirements, including staff-student ratio, must be met during the designated Head Start service hours.

**Performance Standard(s):**

1302.21