

8. Correspondence II – ACF-OHS-IM-25-02 Fiscal Year 2025 Monitoring Process for Head Start Recipients

ACF Administration for Children and Families	U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES	
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INFORMATION MEMORANDUM

TO: All Head Start Recipients

SUBJECT: Fiscal Year 2025 Monitoring Process for Head Start Recipients

INFORMATION:

[Section 641A](#) of the Improving Head Start for School Readiness Act of 2007 (the Act) requires the Office of Head Start (OHS) to implement ongoing monitoring of all programs receiving federal funds.

This Information Memorandum (IM) outlines the OHS monitoring process for fiscal year 2025 (FY25). It describes the types of monitoring reviews that recipients may experience, highlighting Focus Area 1 (FA1), Focus Area 2 (FA2), Classroom Assessment Scoring System (CLASS®), Risk Assessment Notification (RAN), and unannounced reviews. This IM includes information on monitoring for Tribal grant recipients that have consolidated their Head Start program into an approved P.L. 102-477 Plan.

This IM supersedes ACF-OHS-IM-24-07 with updates to the FY25 monitoring implementation format.

FY25 Monitoring Review Types and Start Dates

Review Type*	FY25 Implementation Format	Start Date
FA1	FA1 reviews are conducted through a virtual format.	December 2024
FA2	FA2 reviews are conducted through on-site monitoring.	December 2024
CLASS®	CLASS reviews are conducted again this year using either self-recorded videos or on-site formats.	October 2024
Follow-up Reviews	Follow-up reviews are conducted either virtually or on site.	Start dates will coincide with the end of the corrective action period.
RAN	RAN reviews are conducted through a virtual format.	As needed
Other	Special reviews may be conducted at any time, on site or virtually, without notice.	As needed

** Monitoring reviews may be conducted with or without prior notification to the recipient. OHS reserves the right to conduct unannounced reviews at any time.*

FA1 Reviews

The FA1 review is an opportunity for recipients to describe their approach and plan for providing high-quality services to children and families. It typically occurs in the first or second year of the

grant period. This focus area determines if programs are meeting the requirements of the Head Start Program Performance Standards (the Performance Standards), Uniform Guidance, and Head Start Act. The FA1 informs OHS' understanding of each recipient's foundation for program services — staffing structure, program design and governance, education, health and family services, and fiscal infrastructure. The FA1 review also allows OHS to assist recipients in fulfilling application commitments, provide resources to address any identified issues, and support recipients in reaching their goals.

FA2 Reviews

The FA2 review is an opportunity for recipients to demonstrate their implementation of high-quality services to children and families that meet Head Start requirements. It typically occurs in the third or fourth year of a grant period. This focus area broadens OHS' understanding of each recipient's performance and determines if programs are meeting the requirements of the Performance Standards, Uniform Guidance, and Head Start Act.

CLASS® Reviews

Section 641A(c)(2)(F) of the Act requires OHS to assess the quality of teacher–child interactions using a valid and reliable observation measure. For the upcoming FY25 monitoring year, OHS will continue to use the 2008 edition of the Classroom Assessment Scoring System (CLASS®) Pre-K Teacher–Child Observation Instrument. Scores from CLASS observations will count toward Designation Renewal System (DRS) determinations using the competitive thresholds established in the [Final Rule on DRS Changes](#).

For FY25, recipients that are scheduled for a CLASS monitoring review will have the option to self-record and submit their own videos (Video Review) or request a traditional on-site review with certified CLASS observers (On-site Review).

American Indian and Alaska Native (AIAN) Head Start programs have the option to do a self-review for the CLASS. OHS will transmit a letter to AIAN grant recipients with additional information on this option. All AIAN grant recipients have the option for a self-review, including those that have consolidated their Head Start program into an approved P.L. 102-477 Plan.

All recipients will have the opportunity to attend information sessions specifically developed to discuss FY25 CLASS options, including a group of sessions convened specifically for American Indian and Alaska Native recipients.

RAN Reviews

OHS conducts Risk Assessment Notification reviews, as necessary, to address child health and safety incidents. They are initiated when OHS needs to gather more information about significant incidents affecting program participants' health and safety. These reviews have a specific focus on abuse, neglect, inappropriate conduct, inadequate supervision, or unauthorized releases in Head Start programs.

RAN reviews:

- Ensure prompt and accurate reporting of serious incidents
- Investigate contributing program or management factors

- Communicate necessary corrective actions
- Provide feedback to improve program management and prevent future incidents

Other Reviews

Special reviews are conducted, as needed, to explore concerns outside of the typical FA1 or FA2 schedule. OHS reserves the right to conduct unannounced reviews at any time.

Tribal Programs Integrated Under 477 Plans

Tribal grant recipients that have elected to integrate Head Start into a P.L. 102-477 plan should address monitoring in their P.L. 102-477 plan. The plan should indicate whether the Tribe intends to participate in monitoring conducted by OHS or automatically compete for funding at the end of the current grant period. Monitoring and oversight data provide the basis for continued Head Start funding through the DRS, as required by Congress in the Head Start Act 42 U.S.C. § 9836(c). A Head Start grant recipient may continue to receive funds without competition only when ACF has determined that a program is delivering a high-quality and comprehensive program.

This provision also applies to Tribal programs that are integrated under a P.L. 102-477 Plan. For any Indian Tribe that articulates in its 477 plan the intention to participate in OHS monitoring, OHS will continue to conduct monitoring and a CLASS review (which includes the option for a self-review as described above), to facilitate ACF's ability to determine that the Tribe is delivering a high-quality, comprehensive program. This determination will prevent Tribal Head Start grants from being subject to competition every five years due to insufficient information that meets the statutory requirements of the Head Start Act. In the absence of information from monitoring and oversight reviews conducted by OHS, Head Start programs will be required to compete for funding every five years. These monitoring and oversight requirements are specific to the Head Start Act.

Scheduling

Each year, recipients are required to submit an accurate calendar of availability, which is used to schedule monitoring reviews. The availability calendar also gives recipients a way to inform OHS as to when their program is not operational and when children are not in session. Recipients should immediately update their calendars as changes in program availability occur. Please note that OHS has very limited capacity to accommodate requests to reschedule reviews and can only do so under exceptional circumstances.

Monitoring reviews can also be conducted with or without prior notification to the recipient that it will take place.

Communications

Recipients scheduled to receive a monitoring review in FY25 will receive a notification letter 45 calendar days before the start of the event. They can also expect a planning call with their assigned coordinator to discuss their review. During the initial call, recipients should share their

program's current service delivery options. OHS Review Reports are typically issued within 60 calendar days of the monitoring review.

If you have any questions regarding the FY25 monitoring season, please contact your regional office.

Thank you for the work you do on behalf of children and families.

Sincerely,

/ Khari M. Garvin /

Khari M. Garvin

Director

Office of Head Start