


Performance Standard:	Subpart D Health Services Program	INCA Community Services Head Start & Early Head Start Policies and Procedures 
Sub Category:	1302.47(b)(4)(K) 1301.31(c)(2) 1302.47(b)(5)i; Act 657Ac	
OKDHS:	340:110-3-278	
Policy Council Approval Date:	7/14/2018	
Governing Board Approval Date:	7/30/2018	
Responsible:	All Staff, Area Supervisor and Head Start Director	
Form:	Incident Report Form, Child Abuse Policy Acknowledgement, Parent Handbook, Release of Information Form	
Child Abuse and Neglect Identification and Reporting		
Policy		
INCA reports child abuse and neglect in accordance with the mandatory reporting requirements of Oklahoma Department of Human Services Policy. This policy will provide the guidelines to establish and maintain a preventative program which shall assist in ensuring the safety of Head Start children in the center, home and community.		
Compliance		
Head Start and Early Head Start staff are mandated reporters of suspected or known child abuse/neglect. Staff must report suspicions of child abuse and/or neglect as Federal, State, and local laws and the Performance Standards require. <ul style="list-style-type: none">• This obligation is legal and may not be transferred to someone else.• INCA complies with applicable regulations, including 45 CFR 1301.31 Appendix A (also known as Chapter N-30-356-1 in the Head Start Policy Manual), Identification and Reporting of Child Abuse and Neglect, a portion of which is reprinted here:<ul style="list-style-type: none">○ “Harm or threatened harm to a child’s health or welfare” can occur through: Non-accidental physical or mental injury; sexual abuse, as defined by state law; or neglectful treatment or maltreatment, including the failure to provide adequate food, clothing, or shelter. Provided however, that a parent or guardian legitimately practicing his religious beliefs who thereby does not provide specified medical treatment for a child, for that reason alone shall not be considered a negligent parent or guardian; however, such an exception shall not preclude a court from ordering that medical services to be provided to the child, where his health requires it.• Staff may seek assistance from Program Management or leadership.		

Reporting Procedure on Child Receiving INCA Services

INCA staff that suspects abuse involving a child connected with any of INCA programs will follow these procedures for reporting the incident.

- Contact OKDHS Hotline at 1-800-522-3511 immediately and report the suspected incident or situation, or law enforcement, after hours, by phone. Staff person reporting should also at the time request the name of the individual taking the report and referral file number.
- Report of suspected child abuse/neglect should contain the following information
 - Name and address of child and parents or persons
 - Child's age and birthday
 - Nature and extent of the suspected abuse including any evidence of previous abuse
 - Explanation for the suspected abuse
 - Any other information that might be helpful in establishing cause of the abuse and identify the abuser.
- Report the incident to the Head Start Director or FEC/Area Supervisor.
- Reporting staff shall document the report in ChildPlus / Health / Incident Report
 - Document name of person taking the report
 - Document the case number
 - Document any follow up received

Follow-up on Reported Incident

- FEC/Area Supervisor documents in Child Plus any follow-up based on recommendations made by DHS.
- If no immediate action is deemed necessary by DHS, but staff feels explanation/follow-up is necessary they should contact the FEC/Area Supervisor and/or Head Start Director to discuss the situation.

Reporting Procedure on Child NOT Receiving INCA Services

- If suspected incident of abuse involves a child that is not connected to any of the INCA programs, staff will report the incident to either DHS or law enforcement. No further follow-up is necessary.

Suspected Child Abuse Incident Involving an INCA staff member

If suspected incident of child abuse involves a staff member the following will be followed:

- Follow the same reporting procedures as above.
- Notify the Head Start Director immediately
 - If the incident occurred in a OKDHS licensed facility, a report will also be made to the State Child Care Division
 - The Head Start Director upon reviewing the report will notify the Child Abuse Investigation committee to conduct the internal investigation.

Child Abuse Investigation Committee:

- The team consist of the Head Start Director, Human Resource Director, FEC/Area Supervisor of staff reported and Executive Director.
- The Head Start Director will serve as the liaison for the agency between OKDHS and/or law enforcement.
- Depending on the severity and nature of the suspected abuse incident, the committee will decide if staff will be:
 - suspended from work without pay or

- denied access to any setting involving children pending the outcome of the investigation of DHS or law enforcement.
- OKDHS or law enforcement will be asked to provide information necessary to assist the Child Abuse Investigation Committee in determining outcome actions.
- Corrective action will be determined by the outcome of the investigation.

Informing Parents

- INCA's Child Abuse and Neglect Reporting Policy will be included in the Parent Handbook which is distributed to parents at the time of enrollment by enrollment staff.
- Inform Parents at enrollment that all Head Start and Early Head Start staff members are mandatory reporters of suspected or known child abuse and neglect.
- FEC/Area Supervisor will discuss the Child Abuse Policy Acknowledgment and ask parents to sign it.
 - Parent refusal to sign the Child Abuse Policy Acknowledgement has no bearing on mandatory reporting.

When Child Abuse Report Has Not Been Made by INCA Head Start

There may be occasions when DHS requests information from INCA regarding a child or family where the report was not made by INCA Head Start.

- **If the child is in the custody of DHS**
 - Have the DHS worker sign a release of information as the legal guardian and then release the information as you would to any agency.
- **If the child is not in the custody of DHS**
 - If there is a signed Release of Information, the request will be handled in the same manner that we would handle a request from any agency.
 - If the worker does not have a signed Release of Information they are to be referred to the Head Area Supervisors/FEC or the Head Start Director. The Area Supervisors/FEC or the Head Start Director will discuss the situation with DHS and the reason the information is needed. INCA Head Start staff will document any follow up regarding this situation in a case note in Electronic Data System and any plan for the family.
- **One exception: DHS or law enforcement may have deemed the child is in at risk and be in the process of gathering information to remove the child from the home immediately.**
 - The Area Supervisor should provide the DHS worker the information necessary to locate the child and if necessary meet with child at the Center.
 - Should the child be removed from the center, the Area Supervisor will have the DHS worker or law enforcement sign the agency form showing that the child is being removed from the site.
 - Remind the individual removing the child that they need contact the parents immediately in order to explain why the child will not be returned home by Head Start.
 - The Area Supervisor will document the situation in a Child Plus case note and immediately notify the Head Start Director.

Resolving Concerns

The Head Start Director will be responsible for setting up meetings with DHS regarding any concerns raised by either DHS or INCA Head Start.

Training

- INCA provides training to all Head Start staff in identifying, reporting, and preventing potential cases of child abuse and neglect.
- All staff will be trained in child abuse reporting and identifying child abuse.

Definitions/Acronyms

OKDHS - Department of Human Services
INCA - Head Start and Early Head Start programs
HS - Head Start program
EHS - Early Head Start program
FEC - Family Engagement Coordinator

Dissemination of Policy

The policy will be made available to all Head Start employees through the agency's website @ www.incacaa.org. The agency will educate and train applicable employees and supervisors regarding the policy and any conduct that could constitute a violation of the policy.