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| Performance Standard: | Part 1302 Program Operations ERSEA | <p style="text-align: center;">INCA Community Services</p> <p style="text-align: center;">Head Start & Early Head Start Policies and Procedures</p> <div style="text-align: center;">  </div> |
| Sub Category: | Part 10, 11, 12 Eligibility | |
| Policy Council Approval Date: | 10/17 | |
| Governing Board Approval Date: | 10/17 | |
| Form: | Eligibility Verification Form | |
| Responsible: | ERSEA Team (Area Supervisors/Family Engagement Coordinators, ERSEA Manager and Head Start Director) | |

Determining, Verifying, and Documenting Eligibility Policy

1302.10 Purpose

This purpose of this policy is to describe the requirements for determining community strengths, needs and resources as well as recruitment areas. It contains the requirements and procedures for the eligibility determination, recruitment, selection, enrollment and attendance of children and explains the policy concerning the charging of fees.

1302.11 Determining community strengths, needs, and resources.

Service Area

Performance Objective: INCA proposes service area in the grant application and defines its area.

- INCA's service area of Atoka, Johnston, Marshall and Murray counties in the state of Oklahoma and defined the areas by county.
- If INCA decides to change the service area after ACF has approved its grant application, INCA submits to ACF a new service area proposal for approval.

Community Assessment

Performance Objective: INCA conducts a community wide strategic planning and needs assessment (community assessment) to design a program that meets community needs and builds on strengths and resources.

- INCA conducts a community assessment at least once over the five-year grant period.
- The community assessment uses data that describes community strengths, needs, and resources and includes at the minimum:
 - The number of eligible infants, toddlers, preschool age children, and expectant mothers, including their geographic location, race, ethnicity, and languages they

speaking, including:

- Children experiencing homelessness in collaboration with, to the extent possible, McKinney-Vento Local Education Agency Liaisons (42 U.S.C. 11432 (6)(A));
 - Children in foster care; and
 - Children with disabilities, including types of disabilities and relevant services and resources provided to these children by community agencies;
 - The education, health, nutrition and social service needs of eligible children and their families, including prevalent social or economic factors that impact their well-being;
 - Typical work, school, and training schedules of parents with eligible children;
 - Other child development, child care centers, and family child care programs that serve eligible children, including home visiting, publicly funded state and local preschools, and the approximate number of eligible children served;
 - Resources that are available in the community to address the needs of eligible children and their families; and,
 - Strengths of the community
- INCA must annually review and update the community assessment to reflect any significant changes including:
 - increased availability of publicly-funded pre-kindergarten- (including an assessment of how the pre-kindergarten available in the community meets the needs of the parents and children served by INCA, and whether it is offered for a full school day),
 - rates of family and child homelessness,
 - and significant shifts in community demographics and resources.
 - INCA must consider whether the characteristics of the community allow it to include children from diverse economic backgrounds that would be supported by other funding sources, including private pay, in addition to the INCA's eligible funded enrollment.
 - INCA does not enroll children from diverse economic backgrounds if it would result in INCA serving less than its eligible funded enrollment.

Eligibility Policy (1302.12; Act 645 a 2)

INCA determines, verifies, and documents eligibility in accordance with the regulations.

Determining, verifying and documenting eligibility

Area Supervisor/Family Engagement Coordinators:

- Conduct an in-person interview with each family, unless impossible or not convenient for the family, in which they can interview the family over the telephone,
- Verify information as required in 1302.12h and 1302.12 i; and
- Create an eligibility determination record for enrolled participants according to 1302.12k.
- When INCA has an alternate method to reasonably determine eligibility based on its community assessment, geographic and administrative data, or from other reliable data sources, it may petition the responsible HHS official to waive requirements in paragraphs

1302.12 (a)(1)(i) and (ii).

Age Requirement

For Early Head Start, except when the child is transitioning to Head Start, a child must be an infant or a toddler younger than three years old.

For Head Start, a child must:

- Be at least three years old or, turn three years old by the date used to determine eligibility for public school in the community in which the Head Start program is located; and,
- Be no older than the age required to attend school.

Eligibility Requirements

A pregnant woman or a child is eligible if:

- The family's income is equal to or below the poverty line; or,
- The family is eligible for or, in the absence of child care, would be potentially eligible for public assistance; including TANF child-only payments, or,
- The child is homeless, as defined in part 1305; or,
- The child is in foster care.

If the family does not meet a criterion under 1302.12 (c)(1), INCA may enroll a child who would benefit from services, provided that these participants only make up to 10 percent of INCA's enrollment in accordance with paragraph 1301.2 (d).

Additional Allowances for INCA programs

- INCA may enroll an additional 35 percent of participants whose families do not meet a criterion described in 1302.12 (c) and whose incomes are below 130 percent of the poverty line, if INCA:
 - Establishes and implements outreach, and enrollment policies and procedures to ensure it is meeting the needs of eligible pregnant women, children, and children with disabilities, before serving pregnant women or children who do not meet the criteria in 1302.12(c); and,
 - Establishes criteria that ensure pregnant women and children eligible under the criteria listed in paragraph 1302.12(c) are served first.

If INCA chooses to enroll participants who do not meet a criterion in paragraph 1302.12 (c), and whose family incomes are between 100 and 130 percent of the poverty line, it submits a report to the Head Start regional program office:

- How it is meeting the needs of low-income families or families potentially eligible for public assistance, homeless children, and children in foster care, and include local demographic data on these populations;
- Outreach and enrollment policies and procedures that ensure it is meeting the needs of eligible children or pregnant women, before serving over-income children or pregnant women;
- Efforts, including outreach, to be fully enrolled with eligible pregnant women or children;
- Policies, procedures, and selection criteria it uses to serve eligible children;
- Its current enrollment and its enrollment for the previous year;
- The number of pregnant women and children served, disaggregated by the eligibility criteria in 1302.12 d(c) and 1302.12 (d)(1); and,

- The eligibility criteria category of each child in the INCA's waiting list.

Eligibility requirements for communities with 1,000 or fewer individuals

- INCA establishes its own criteria for eligibility which meets the criteria outlined in section 645(a)(2) of the Act.
- No child residing in such community whose family is eligible under criteria described in 1302.12(c)through(f), may be denied an opportunity to participate in INCA under the eligibility criteria established.

Verifying age

INCA staff verify a child's age according to these policies and procedures:

- Head Start Area Supervisor/Family Engagement Coordinator verify the age of the child by examining copy of birth certificate, passport, baptismal certificate, documentation on official letterhead from medical provider or government agency, or documentation on medical insurance care.
- INCA does not require families to provide documents that confirm a child's age, if doing so creates a barrier for the family to enroll the child.

Verifying Eligibility Based on Income

To verify eligibility based on income, INCA staff uses tax forms, pay stubs, or other proof of income to determine the family income for the relevant time period.

- If the family:
 - cannot provide tax forms, pay stubs, or other proof of income for the relevant time period, INCA staff may accept written statements from employers, including individuals who are self-employed, for the relevant time period and use information provided to calculate total annual income with appropriate multipliers.
 - reports no income for the relevant time period, INCA may accept the family's signed declaration to that effect
 - if INCA staff describes efforts made to verify the family's income, and explains how the family's total income was calculated or seeks information from third parties about the family's eligibility, if the family gives written consent.
 - gives consent to contact third parties, INCA staff must adhere to INCA safety and privacy policies and procedures and ensure the eligibility determination record adheres to 1302.12(k)(2).
 - can demonstrate a significant change in income for the relevant time period, INCA staff may consider current income circumstances.

Verify Eligibility Based on Public Assistance

To verify whether a family is eligible for, or in the absence of child care, would be potentially eligible for public assistance, INCA obtains documentation from either the state, local, or tribal public assistance agency that shows the family either receives public assistance or that shows the family is potentially eligible to receive public assistance.

Verify Eligibility Base on Homeless and Foster Care

- To verify whether a family is homeless, INCA may accept a written statement from:

- Homeless services provider,
- School personnel,
- Other public or private service agency attesting that the child is homeless,
 - or any other documentation that indicates homelessness,
 - a declaration,
 - information gathered on enrollment or application forms,
 - or notes from an interview with staff to establish the child is homeless.
- If a family can provide one of the documents described above, Area Supervisors/Family Engagement Coordinators document in Eligibility Verification form efforts made to verify the accuracy of the information provided and state whether the family is eligible because they are homeless.
- If a family cannot provide one of the documents described above to prove the child is homeless, INCA may accept the family's signed declaration on the eligibility verification to that effect, if, in a written statement, INCA staff describe the child's living situation that meets the definition of homeless in part 1305.
- INCA may seek information from third parties who have firsthand knowledge about a family's living situation, if the family gives written consent.
 - If the family gives consent to contact third parties, INCA staff must adhere to INCA privacy policies and procedures and ensure the eligibility determination record adheres to paragraph 1302.12 (k).

Verify Eligibility Based on Foster Care

To verify whether a child is in foster care, INCA staff accepts:

- a court order;
- or other legal or government-issued document,
- a written statement from a government child welfare official that demonstrates the child is in foster care,
- or proof of a foster care payment.

Eligibility Duration

- If a child is determined eligible under this section and is participating in INCA's program, he or she will remain eligible through the end of the succeeding program year.
 - Income verification completed upon beginning of third year in Head Start.
 - INCA may choose not to enroll a child when there are compelling reasons for the child not to remain, such as when there is a change in the child's family income and there is a child with a greater need for Head Start services.
- Children who are enrolled in INCA Head Start receiving funds under the authority of section 645A of the Head Start Act remain eligible while they participate in the program.
- INCA operates both an Early Head Start and a Head Start program, if the parents wish to enroll their child who has been enrolled in INCA's Early Head Start, INCA ensures whenever possible, the child receives Head Start services until enrolled in school, provided the child is eligible.
 - When a child moves from an Early Head Start program to a Head Start program, INCA must verify the family's eligibility again.

Records

- INCA keeps eligibility determination records for each participant and ongoing records of

the eligibility training for staff required by 1302.12 (m).

- INCA uses an electronic record keeping system to input family household size and income as stated in the federal income guidelines to determine each family's eligibility.
- Each eligibility determination record must include:
 - Copies of any documents or statements, including declarations, that are deemed necessary to verify eligibility under 1302.12 (h) and 1302.12(i) of this section;
 - A statement that INCA staff has made reasonable efforts to verify information by:
 - Conducting either an in-person, or a telephone interview with the family as described under 1302.12 (a)(1)(i) or (a)(2); and,
 - Describing efforts made to verify eligibility, as required; and, collecting documents required for third party verification that includes the family's written consent to contact each third party, the third parties' names, titles, and affiliations, and information from third parties regarding the family's eligibility.
 - A statement on Eligibility Verification Form that identifies whether:
 - The family's income is below income guidelines for its size, and lists the family's size;
 - The family is eligible for or, in the absence of child care, potentially eligible for public assistance;
 - The child is a homeless child or the child is in foster care;
 - The family was determined to be eligible under the criterion in 1302.12(c)(2); or,
 - The family was determined to be eligible under the criterion in 1302.12(d)(1).
- INCA keeps eligibility determination records for those currently enrolled, as long as they are enrolled, and, for one year after they have either stopped receiving services; or are no longer enrolled.

Violation of these Policies and Procedures

If INCA leadership determines that a programstaff person has violated Federal and/or program eligibility determination regulation and/or enroll pregnant women and children who are not eligible to receive Early Head Start or Head Start services, INCA will administer disciplinary action up to and including termination.

Training On Eligibility

- INCA trains all governing body, policy council, management, and staff who determine eligibility on applicable federal regulations and INCA policies and procedures. Training at a minimum:
 - Include methods on how to collect complete and accurate eligibility information from families and third-party sources;
 - Incorporate strategies for treating families with dignity and respect and for dealing with possible issues of domestic violence, stigma, and privacy; and,
 - Explains INCA policies and procedures that describe actions taken against staff, families, or participants who attempt to provide or intentionally provide false information.
- INCA trains management and staff members who make eligibility determinations within 90 days of hiring new staff.
- INCA trains all governing body and policy council members within 180 days of the beginning of the term of a new governing body or policy council.
- Annual Training will be provided for governing body, policy council, management, and staff who determine eligibility on applicable federal regulations and INCA policies and procedures.
- INCA conducts training annually. Other training will be conducted as needed.

Documentation Required

Definitions/ Acronyms

ACF - Administration for Children and Families

Children with Disabilities - Children with mental retardation, hearing impairments (including deafness,) speech or language impairments, visual impairments (including blindness,) serious emotional disturbance, orthopedic impairments, autism, traumatic brain injury, other health impairments, other or specific learning disabilities who, by reason may need special education and related services. The term “children with disabilities” for children age 3 to 5, inclusive, may, at a State’s discretion, include children experiencing developmental delays, as defined by a State and as measured by appropriate diagnostic instruments and procedures, in one or more of the following areas: physical development, cognitive development, communication development, social or emotional development, and adaptive development; and who, by reason thereof, need special education and related services.

Enrolled (or any variation of) A child has been accepted and attended at least one class for center-based option.

Funded Enrollment - The number of participants which the Head Start grantee is to serve, as indicated on the grant award.

EHS - Early Head Start program - A public or private non-profit or for-profit entity designated by ACF to operate an Early Head Start program to serve pregnant women and children from birth to age three, pursuant to Section 645A(e) of the Head Start Act.

ERSEA - Eligibility, Recruitment, Selection, Enrollment and Attendance

Family

All persons living in the same household who are supported by the child’s parent(s) or guardian(s) income; **and** are related to the child’s parent(s) or guardian(s) by blood, marriage, or adoption; or are the child’s authorized caregiver or legally responsible party.

Foster Care - 24-hour substitute care for children placed away from their parents or guardians and for whom the state agency has placement and care responsibility. This includes, but is not limited to, placements in foster family homes, foster homes of relatives, group homes, emergency shelters, residential facilities, child-care institutions, and pre-adoptive homes. A child is in foster

care in accordance with this definition regardless of whether the foster care facility is licensed and payments are made by the state or local agency for the care of the child, whether adoption subsidy payments are being made prior to the finalization of an adoption, or whether there is federal matching of any payments that are made.

INCA - Head Start and Early Head Start programs

HS - Head Start program - A public or private non-profit or for-profit entity designated by ACF to operate an Head Start program to serve pregnant women and children from birth to age three, pursuant to Section 645A(e) of the Head Start Act.

Homeless Children - Means the same as homeless children and youths in Section 725(2) of the McKinney-Vento Homeless Assistance Act at 42 U.S.C. 11434a (2).

As follows:

(2) The term homeless children and youths' —

(A) means individuals who lack a fixed, regular, and adequate nighttime residence (within the meaning of section 103(a)(1)); and

(B) includes —

(i) children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; are abandoned in hospitals; or are awaiting foster care placement;

(ii) children and youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings (within the meaning of section 103(a)(2)(C));

(iii) children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and

(iv) migratory children (as such term is defined in section 1309 of the Elementary and Secondary Education Act of 1965) who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii).

Income - Gross cash income and includes earned income, military income (including pay and allowances, except those described in Section 645(a)(3)(B) of the Act), veteran's benefits, Social Security benefits, unemployment compensation, and public assistance benefits. Additional examples of gross cash income are listed in the definition of "income" which appears in U.S. Bureau of the Census, Current Population Reports, Series P-60-185 (available at <https://www2.census.gov/prod2/popscan/p60-185.pdf>).

Parent - A Head Start or Early Head Start child's mother or father, other family member who is a primary caregiver, foster parent or authorized caregiver, guardian or the person with whom the child has been placed for purposes of adoption pending a final adoption decree.

Recruitment Area - That geographic locality within which a Head Start program seeks to enroll Head Start children and families. The recruitment area can be the same as the service area or it can be a smaller area or areas within the service area.

Relevant Time Period - (1) The 12 months preceding the month in which the application is submitted; or (2) During the calendar year preceding the calendar year in which the application is submitted, whichever more accurately reflects the needs of the family at the time of application.

Service Area - The geographic area identified in an approved grant application within which a grantee may provide Head Start services.

Verify - (or any variance of the word) To check or determine the correctness or truth by investigation or by reference.

Dissemination of Policy

The policy will be made available to all Head Start employees through the agency's website @ www.incacao.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.

