



CHAMPAIGN COUNTY  
REGIONAL PLANNING  
COMMISSION

## Memorandum

**To:** Champaign County Regional Planning Commissioners  
**From:** Brandi Granse, Early Childhood Division Director  
**Date:** Thursday, November 12, 2020  
**Subject:** Action Item & Materials for Commissioners – RPC November 20, 2020 Meeting

Among the myriad of Head Start standards and regulations, you need to be aware of the following.

- Code of Conduct and In-kind Donation at meetings where Head Start matters are on the agenda (document for signature attached)
- ERSEA or Eligibility, Recruitment, Selection, Enrollment, Attendance (training information attached)
- Leadership and Governance Training (training information attached)

I respectfully request the Commissioners review and sign the Code of Conduct/In-kind Donation and review and complete the trainings offered.

In addition, our program will have a Focus Area One Federal Monitoring Review in the near future, and I will need support from the RPC Commissioners to participate in a virtual interview with the monitors. In preparation, I provided a link to the Focus Area One Monitoring Protocol for your review.

Please contact me if you have any questions regarding these materials.



**Early Childhood Education Program**

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**RPC Early Childhood Education Program  
(Champaign County Head Start/Early Head Start)  
CODE OF CONDUCT FOR POLICY COUNCIL AND  
GOVERNING BODY MEMBERS**

POLICY

The Champaign County Regional Planning Commission recognizes that persons on the Champaign County Head Start/Early Head Start (CCHS) Policy Council and the Champaign County Regional Planning Commission (RPC) are leaders, models, and representatives of the organization. All members are expected to conduct themselves such that their personal and professional conduct does not have a negative effect on services or reflect negatively on the public image, reputation, or credibility of the program.

PROCEDURES

1. Acceptable standards of conduct will be established and periodically revised by the Champaign County Regional Planning Commission and the Policy Council for both Council and RPC members.
2. The RPC Early Childhood Division Director will provide new Council and RPC members a copy of the code of conduct for review and signature.
3. The RPC in its entirety will be responsible, with a simple majority vote of members present for a regularly scheduled or appropriately called special meeting, for reprimanding or removing any representative from the Council or RPC due to conduct violations.

CODE of CONDUCT

The CCHS Policy Council and the RPC members:

1. Will respect and promote the unique identity of each child, family, employee, Council, and RPC member and refrain from stereotyping on the



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- basis of gender, race, ethnicity, culture, religion, disability, sexual orientation, or family composition.
2. Must uphold the agency's confidentiality guidelines stated as follows:
    - a. No information regarding specific children and their families, employees, and Policy Council members shall be discussed outside of the work setting or Council/RPC meetings;
    - b. Information shall be discussed within the work setting and at Council/RPC meetings only as is necessary and related to program operations, business or decision-making;
    - c. No information learned at Council/RPC meetings or while conducting Council/RPC business shall be discussed or used in any way outside of Council/RPC activities.
  3. Will support and participate in a teamwork approach to decision making.
  4. Will behave and interact respectfully while participating on the Council/RPC and/or while representing the organization within the community.
  5. Must have an interest and concern for children and their families, staff, and the community.
  6. May not accept gifts and/or gratuities as stated in the RPC Personnel Policy as attached.
  7. Are prohibited from using their position on the Council/RPC for purposes which are, or give the appearance of being, motivated by a desire for private gain for themselves or a member's family, business or other ties.
  8. Shall declare a possible conflict of interest, or appearance of such, regarding the vote on any agenda item which may result in private gain for



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themselves or a member’s family, business or other ties, and shall be recused from voting on such items.

- 9. Must not make public statements under the auspices of any agency title without approval of the RPC Chief Executive Officer.
- 10. Will follow generally accepted ethical business practices and the RPC Personnel Policy.
- 11. Will respect and uphold the legal authority of the RPC to establish, review, or revise the standards of conduct for individuals participating on the Council/RPC.

I \_\_\_\_\_ (printed name) shall adhere to this Code of Conduct for Policy Council and Governing Body members while serving as well as after I am no longer a member.

Additionally, my signature below also documents my acknowledgement that time I spend at meetings where CCHS matters are on the agenda will be considered in-kind and valued at the rate used for the County Board members’ stipend.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date



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RPC EARLY CHILDHOOD EDUCATION PROGRAM  
Governing Body and Policy Council  
ERSEA Training  
(Eligibility/Recruitment/Selection/Enrollment/Attendance)

The following is a summary of the most significant points in the Head Start Programs Performance Standard 1302.12 for determining families' eligibility for Head Start/Early Head Start services.

1. Determining Eligibility
  - a. Staff must conduct either an in-person, or, when justified (i.e. family lives out of the County but is moving here), telephone interview with the family.
  - b. Children must be age-eligible for the program and at least 90% of enrolled families must be categorically or income eligible. Categorical eligibility includes a homeless child/family or a child in foster care.
  - c. A program must keep eligibility determination records for each participant and copies of any documents, including declarations, deemed necessary to verify eligibility.
  - d. Early Head Start eligibility continues from year to year until a child reaches 3 years old at which time the program must re-determine eligibility for Head Start enrollment if the family wishes to remain enrolled in the program.
  - e. A child in Head Start remains eligible for two years after which the eligibility must be redetermined.
  
2. Selection
  - a. A program must identify a process to prioritize which family, among all the families determined eligible, receives an enrollment vacancy.
  - b. The Early Childhood Education Program uses a priority point system that considers child and family risk factors as well as community needs.
  
3. Violation of Eligibility Regulations
  - a. A program must have policies and procedures that describe actions taken when staff intentionally violate eligibility regulations.
  - b. The Regional Planning Commission Personnel Policies and the bargaining unit contract describe actions taken if staff fail to follow policies and/or procedures.
  
4. Training
  - a. Governing body and policy council members must receive ERSEA training within 180 days after joining these groups. A program must train management and staff members who make eligibility determinations within 90 days of hiring such staff.
  - b. Within one month of the individual joining the RPC Board or the Policy Council, the Early Childhood Division Director provides new members with the link to Office of Head Leadership and Governance training.



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## **RPC EARLY CHILDHOOD EDUCATION PROGRAM Head Start Leadership and Governance Training**

Head Start leadership and governance:

- Set the direction for Head Start and Early Head Start programs
- Exercise fiscal and legal oversight
- Create a balanced representation of voices that ensure stakeholder input, diversity, and accountability to the community

The Office of Head Start provides self-paced, interactive training modules that offer activities and real-world scenarios. Management staff, governing body/Tribal Council, and Policy Council members can use this tool to refine their governance knowledge and leadership skills.

**Leadership and Governance Training** (Click on the link below to access training)

[https://eclkc.ohs.acf.hhs.gov/sites/default/files/learning-modules/program-governance-v6/story\\_html5.html](https://eclkc.ohs.acf.hhs.gov/sites/default/files/learning-modules/program-governance-v6/story_html5.html)

**Head Start Program Leadership Responsibilities** (Click on the link below to access the document)

<https://eclkc.ohs.acf.hhs.gov/sites/default/files/pdf/no-search/hs-program-leadership-responsibilities-completed-handout.pdf>

**Head Start Leadership and Governance Key Activities** (Click on the link below to access the document)

<https://eclkc.ohs.acf.hhs.gov/sites/default/files/pdf/no-search/leadership-and-governance-key-activities.pdf>



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## Head Start Program Leadership Responsibilities

### Adopt practices to ensure active, independent, and informed governance:

- Fully participate in the development, planning, and evaluation of the Head Start program governing body bylaws
- Create procedures for accessing and collecting information
- Develop written standards of conduct
- Establish Policy Council bylaws and election procedures
- Establish advisory committees as deemed necessary

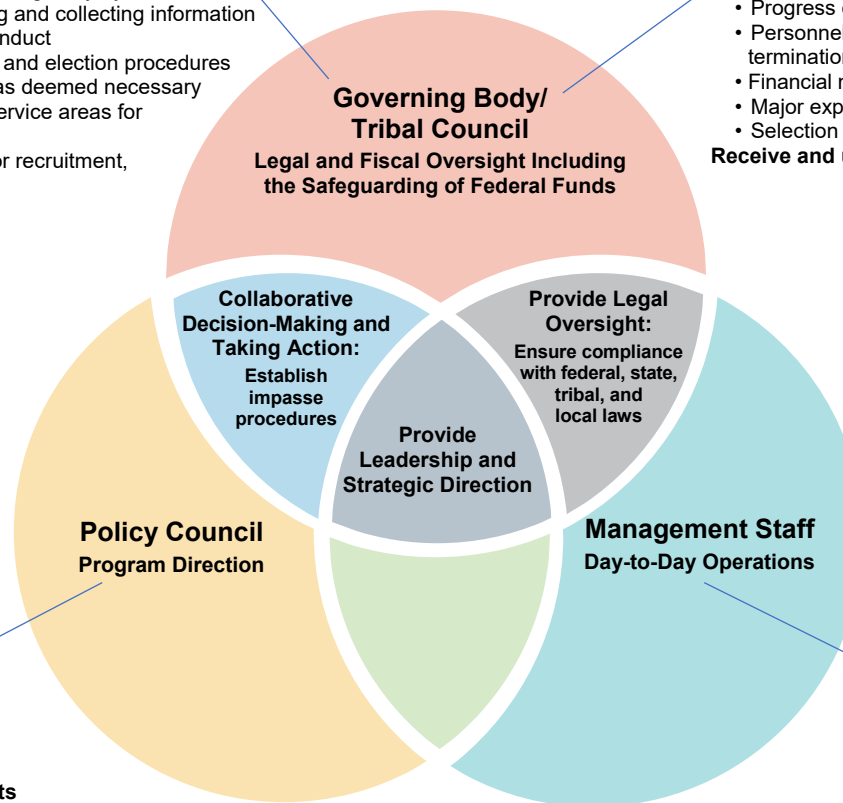
**Select** delegate agencies and the service areas for such agencies

**Establish** procedures and criteria for recruitment, selection, and enrollment

### Approve and submit to the governing body:

- Activities that involve parents and ensure responsive services
- Program recruitment, selection, and enrollment priorities
- Funding applications and amendments
- Budget planning
- Policy Council bylaws and election procedures
- Head Start program personnel policies and decisions
- Recommendations on delegates and service areas

**Receive and use operational reports**



### Review:

- Funding applications and amendments
- Results and follow-up activities from federal monitoring

### Review and approve:

- Major policies and procedures
- Progress on implementing the Head Start grant
- Personnel policies regarding the hiring, evaluation, termination, and compensation of agency employees
- Financial management, accounting, and reporting policies
- Major expenditures and operating budget
- Selection of auditor and actions to correct audit findings

### Receive and use operational reports

### Operational Reports:

- HHS secretary communication
- Financial statement
- Program information summaries
- Data on school readiness goals
- Enrollment
- USDA
- Financial audit
- Self-assessment
- Community assessment
- Program Information Report (PIR)

### Key responsibilities:

- Develop and implement policies and procedures
- Provide training and technical assistance to governing body/Tribal Council, Policy Council, staff, and volunteers
- Provide ongoing supervision of staff and budget to ensure compliance and continuity of care
- Oversee continuous quality improvement
- Oversee management and protection of program data
- Maintain an automated accounting and recordkeeping system
- Monitor goals, objectives, and regulatory compliance
- Engage in the establishment and management of parent committees
- Generate and share operational reports with Policy Council, governing body/Tribal Council, and HHS (as appropriate)





## Head Start Leadership and Governance Key Activities

Activity	Management Team	Policy Council/Committee	Governing Body/Tribal Council
<b>Policies and Procedures</b>			
<b>Developing Bylaws</b>	<ul style="list-style-type: none"> <li>• Draft governing body/Tribal Council and Policy Council bylaws and amendments</li> </ul>	<ul style="list-style-type: none"> <li>• Submit decisions regarding Policy Council bylaws to governing body/Tribal Council</li> </ul>	<ul style="list-style-type: none"> <li>• Adopt bylaws and amendments for governing body/Tribal Council and Policy Council</li> </ul>
<b>Developing Governance Structure</b>	<ul style="list-style-type: none"> <li>• Draft policies and procedures for consideration by Policy Council and governing body/Tribal Council</li> <li>• Oversee the implementation of approved policies and procedures</li> <li>• Provide training to governing body/Tribal Council and Policy Council</li> <li>• Focus on continuous quality improvement</li> <li>• Oversee management and protection of program data</li> <li>• Maintain automated accounting and recordkeeping system</li> <li>• Monitor goals, objectives, and regulatory compliance</li> <li>• Establish and manage parent committees to:               <ul style="list-style-type: none"> <li>○ Advise staff on parent engagement activities</li> <li>○ Communicate with Policy Council/Committee</li> <li>○ Participate in the recruitment and screening of Head Start employees</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Approve and submit to the governing body/Tribal Council decisions regarding:               <ul style="list-style-type: none"> <li>○ Activities to actively involve parents and ensure responsive services</li> <li>○ Recruitment, selection, and enrollment priorities</li> <li>○ Funding applications and amendments</li> <li>○ Budget planning, including policies supporting Policy Council activities</li> <li>○ Policy Council bylaws and election procedures</li> <li>○ Head Start program personnel policies and decisions, including criteria for employment and dismissal of program staff</li> <li>○ Recommendations on delegates and service areas</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Select delegate agencies and service areas</li> <li>• Establish procedures and criteria for recruitment, selection, and enrollment</li> <li>• Review results and follow-up from federal monitoring</li> <li>• Review and approve:               <ul style="list-style-type: none"> <li>○ Funding applications and amendments</li> <li>○ Major policies and procedures, including self-assessment and financial audit</li> <li>○ Progress on implementing the Head Start grant, including corrective actions</li> <li>○ Personnel policies regarding the hiring, evaluation, termination, and compensation of agency employees, including the Head Start director and management team</li> <li>○ Financial management, accounting, and reporting policies</li> </ul> </li> </ul>



<p><b>Developing Governance Structure</b></p>			<ul style="list-style-type: none"> <li>○ Major expenditures and operating budget</li> <li>○ Selection of an auditor and actions to correct audit findings</li> <li>• Adopt: <ul style="list-style-type: none"> <li>○ Procedures for accessing and collecting information</li> <li>○ Standards of conduct, including conflicts of interest and complaints</li> <li>○ Procedures for selecting Policy Council members</li> <li>○ Procedures for utilizing advisory committees</li> </ul> </li> </ul>
<p><b>Providing Leadership and Strategic Direction</b></p>	<ul style="list-style-type: none"> <li>• Outline planning process and protocols for planning committee, including staffing considerations</li> <li>• Review key reports and recommend program and school readiness plans</li> <li>• Prepare goals and objectives</li> <li>• Use program plans to support reporting, ongoing monitoring, and self-assessment</li> <li>• Outline required adjustments to goals and objectives</li> </ul>	<ul style="list-style-type: none"> <li>• Work with staff to select planning committee with focus on parent engagement</li> <li>• Review recommendations for planning committee</li> <li>• Approve goals and objectives</li> <li>• Respond to progress reports</li> <li>• Use data for ongoing oversight and correction</li> <li>• Approve adjusted goals and objectives</li> </ul>	<ul style="list-style-type: none"> <li>• Work with management staff to select planning committee, including governing body/Tribal Council representation</li> <li>• Review recommendations for planning committee</li> <li>• Ratify goals and objectives</li> <li>• Respond to progress reports</li> <li>• Use data for ongoing oversight and correction</li> <li>• Ratify adjusted goals and objectives</li> </ul>

<p><b>Monitoring Program Performance</b></p>	<ul style="list-style-type: none"> <li>• Generate reports to monitor compliance and goal attainment that include:             <ul style="list-style-type: none"> <li>○ U.S. Department of Health and Human Services (HHS) secretary communication</li> <li>○ Financial statements</li> <li>○ Program information summaries</li> <li>○ Ongoing monitoring results</li> <li>○ Data on school readiness</li> <li>○ Enrollment</li> <li>○ U.S. Department of Agriculture (USDA) nutrition reports</li> <li>○ Financial audit</li> <li>○ Self-assessment</li> <li>○ Community assessment</li> <li>○ Program Information Report (PIR)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Review related reports</li> <li>• Use data for ongoing oversight, correction, and self-assessment</li> </ul>	<ul style="list-style-type: none"> <li>• Review related reports</li> <li>• Use data for ongoing oversight, correction, and self-assessment</li> </ul>
<p><b>Ensuring Consensus</b></p>	<ul style="list-style-type: none"> <li>• Develop procedures with governing body/Tribal Council and Policy Council and facilitate selection of mediator and arbitrator</li> </ul>	<ul style="list-style-type: none"> <li>• Jointly establish written procedures for resolving internal disputes between governing body/Tribal Council and Policy Council in a timely manner that include impasse procedures. These procedures:             <ul style="list-style-type: none"> <li>○ Demonstrate the governing body/Tribal Council considers proposed decisions from the Policy Council and vice versa</li> <li>○ Require the governing body/Tribal Council and the Policy Council to notify the other in writing why it does not accept a decision</li> <li>○ Describe a decision-making process and a timeline to resolve disputes and reach decisions that are not arbitrary, capricious, or illegal</li> </ul> </li> <li>• If the agency's decision-making process does not result in a resolution and an impasse continues, governing body/Tribal Council and Policy Council must select a mutually agreeable third-party mediator and participate in a formal process of mediation that leads to a resolution of the dispute</li> <li>• If no resolution is reached with a mediator, governing body and Policy Council must select a mutually agreeable arbitrator whose decision is final. This does not apply to American Indian and Alaska Native (AIAN) programs</li> </ul>	





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## Focus Area One Monitoring Protocol Federal Monitoring Review Preparation

FY 2021 Focus Area One Monitoring Protocol – Full Document (click on link below)

<https://eclkc.ohs.acf.hhs.gov/sites/default/files/pdf/FA1ProtocolFY2021.pdf>

### **Purpose**

Focus Area One (FA1) is an opportunity for grantees to discuss their program design, management, and governance structure. Grantees will describe the program's approaches to staffing structure, program design, education, health services, family services, fiscal infrastructure, and program governance.

### **Approach**

The FA1 review is an off-site interview. The review begins with the reviewer conducting a document review using data and reports from the Head Start Enterprise System (HSES) and other sources to learn about the grantee's program design and understand the needs of the children and families the grantee serves. Prior to the call with the grantee, the reviewer will speak with the grantee's regional program and fiscal specialists for additional context about the grantee.

Following the document review, the reviewer will conduct a series of off-site telephone interviews with the grantee that occur during a 1-week period. These discussions will provide an understanding of the program's design and plans for implementing and ensuring comprehensive, high-quality services that meet the needs of children and families.

### **Methodology**

Document Review. The reviewer will focus on the following listed documents located in the HSES or other available sources:

- Grant application/goals including the budget
- Program Information Report data
- Community Assessment summary
- Past monitoring data



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- Self-Assessment data
- Annual Report
- Audits

Virtual Discussions. The reviewer will work with the grantee to identify the appropriate individuals to participate in the off-site discussions (e.g., the governing body, the policy council, managers, and direct service staff).

### **Road Map to the FY 2021 Focus Area One Monitoring Protocol**

This protocol will guide the discussions between the grantee and the reviewer during the FA1 review. It includes the topic areas for discussion, specific performance areas for assessment, and the Federal regulations associated with each area of performance. The protocol is divided into the following five topic areas:

- Program design, management, and quality improvement
- Designing quality education and child development program services
- Designing quality health program services
- Designing quality family and community engagement program services
- Developing effective Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) strategies and fiscal infrastructure

### **Outcomes**

NEW in FY 2021: Grantees will *explain the types of data* collected to measure outcomes for each program area during the FA1 review. The Focus Area Two (FA2) review event will provide grantees with the opportunity to *share these data* and discuss how the information is used for continuous improvement. Information learned in FA1 will be used for grantees to demonstrate how the program uses data to drive child, family, and programmatic outcomes during the FA2 review.

### **Federal Regulations**

Each section of the protocol includes a list of the Federal regulations grounding the discussions. This list ensures transparency regarding the regulations used when assessing grantee performance. Grantees should note that they remain accountable for all of the Head Start Program Performance Standards (HSPPS) and other Federal, state, and local regulations guiding program operations, management, and oversight.



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