

# **Board Policy 2520P – Administrative Procedure for ERSEA**

### ADMINISTRATIVE PROCEDURE

2520P

SUBJECT: Procedures and Criteria for Recruiting, Selecting and Enrolling Children

The Federal Head Start Performance Standard 1301.3 Program Governance requires that the Board establish the criteria for recruitment, selection and enrollment priorities for the Head Start and Early Head Start program.

The Superintendent or his/her designee shall develop the procedure necessary to meet this responsibility.

LEGAL REFERENCE: 45 CFR Chapter XIII (09-1-16 Edition) 1301.3 Head Start Performance Standards

EARLY LEARNING PROCEDURES:

DATE ADOPTED: March 17, 2011



RENUMBERED: January 21, 2016, from 5120P

# **ELIGIBILITY**

### Intake Application Form

The Intake Application Form for all program options are completed either by department secretaries in the OESD office or enrolling staff. This process also applies to faxed referrals from Department of Child and Family Services (DCFS) or other community agencies, or upon receipt of a Program Inquiry Form.

### **ELIGIBILITY CRITERIA TABLE**

\*Eligibility at a glance: ensure that you refer to and follow all of the Eligibility Procedures\*

Head Start	ECEAP	EHS
Program 4 year olds	Program 4 year olds	Prenatal, infants, and toddlers
3 year olds can be enrolled based on selection points if we meet class size requirement	We must exhaust eligible 4 year olds on wait list and conduct extraordinary recruitment efforts before enrolling 3 year old children; & consult Family Services Coordinator	Classroom size limited to 8 infants
SSI – Auto eligible		SSI – Auto eligible
Foster Child – Auto eligible	Foster Child – Auto Eligible	Foster Child – Auto eligible
State Child Care Subsidy – Auto eligible	IEP – Auto Eligible	State Child Care Subsidy – Auto eligible
TANF Cash Grant – Auto Eligible	TANF Cash Grant– Auto Eligible	TANF Cash Grant – Auto Eligible
Homeless – Auto Eligible		Homeless – Auto eligible
Income up to 100% FPL (see current table)	Income up to 110% FPL (see current table)	
Income between 100-130% FPL- must consult with Family Services Coordinator		Income between 100-130% FPL- must consult with Family Services Coordinator
10% over income – consult with Family Services Coordinator – priority given to children on IEP – consult with Disabilities Coord	Other developmental and environmental factors for families not income eligible – see attached guidelines	10% over income – consult with Early Head Start Coordinator



3 year olds who turn 3 after August 31 can be enrolled Feb 1 and only after consulting Family Services Coordinator		Most Program Options are population specific-see attached guidelines
Military – see specific HS/EHS military income procedures	Military – see specific ECEAP military income procedures	Military-see specific HS/EHS military income procedures

Calculate income by dividing the family's income by the current Federal Poverty Guideline (100% FPL), monthly or yearly.

## **ECEAP INCOME ELIGIBITY REQUIREMENTS**

ECEAP Performance Standard (PS) B-14

In **ECEAP**, income eligibility must be determined using the annual income for either the previous calendar year or the twelve months prior to enrollment, whichever best reflects the family's current financial circumstances.

Under certain circumstances, last month's or current month's income may be used to determine eligibility.

- This applies when recent income is significantly decreased due to death, divorce, unexpected job loss, or similar circumstance. The reason for this exception must be documented on the ECEAP Child Enrollment Form (CEF) so it can be entered in EMS.
- When monthly income is used for eligibility, annual income must still be verified and entered in EMS.

### **ECEAP Definition of Family** PS B-14

All persons living in the household with the ECEAP child who share finances <u>and</u> are related to the child's parent by blood, marriage adoption or legal obligation to provide support are included in the definition of family. For families temporarily sharing housing with relatives or others, do not count the host

The following **counts** as income in the above definition of family:

- Wages or salary before taxes and deductions for all adults.
- Net income from self-employment for all adults.
- Cash amounts to adults or children such as alimony, annuity payments, child support, Emergency Assistance cash payments, foster care grant, insurance payments that are regular (not one-time), retirement or pension payments, scholarships/grants/fellowships for living expenses, Social Security, strike benefits, Supplemental Security, Income, TANF grants including "Non-Needy Relative" or "In Loco Parentis" or "Legal Guardianship" grants, training stipends, Unemployment or Workers Compensation, veteran's benefits (except children or disabled Vietnam veterans) or other regular support from an absent family member or someone not living in the household.
- Interest and dividends, periodic receipts from estates or trusts, net gambling or lottery winnings



The following **does not count** as family income:

- Assets drawn down, such as cash from sale of an asset or bank withdrawals
- Capital gains
- Child support payments to another household for a non-ECEAP child. (Subtract from income.)
- Disability payments made to disabled children of Vietnam veterans as prescribed by the Secretary of Veteran's Affairs
- Food or housing received in lieu of wages
- Non-cash benefits, such as food stamps, housing assistance, Medicaid, Medicare, school lunches, employer-paid fringe benefits
- One-time gifts, loans, lump-sum inheritances, insurance payments, or compensations for injury
- Tax Refunds

# HEAD START AND EARLY HEAD START INCOME ELIGIBILITY REQUIREMENTS

- Families with incomes up to 100% of the Federal Poverty Guidelines
- Families with incomes between 100% 130% of the Federal Poverty Guidelines may be enrolled (limit to 35% of total enrollment) if extraordinary recruitment and outreach has determined this need. Contact with the Family Services Coordinator is required prior to enrolling a child within this income guideline.
- Families with incomes over 100% of the Federal Poverty Guidelines can be enrolled according to their selection criteria and there are no age- and income-eligible 3 or 4 year olds on the wait list (limit of 10% of enrollment & oftentimes reserved for children with disabilities)
- Children may be transitioned from Early Head Start to Head Start with a transition plan prepared by staff and parents around the child's third birthday.
- A child with an IEP, who has turned 3 after August 31<sup>st</sup>, may be enrolled as of their third birthday if that child is referred by the school district special education program or transitions from Holly Ridge Center.
- A child who turns 3 after August 31 may be enrolled mid-year on or after January 1. Office of Head Start guidance Policy Clarification, (OHS-PC-I-001)
- Children with disabilities must comprise at least 10% of total Head Start & Early Head Start enrollment.
- Homeless children are <u>automatically eligible</u> if they meet one of the criteria as defined by the McKinney-Vento Act listed as follows:
  - Sharing the housing of others due to loss of housing, economic hardship, or a similar reason;
  - Living in a motel, campground or trailer due to the lack of an adequate alternative;
  - Staying in a shelter or transitional housing program; and
    - Living in a car, park, abandoned building, bus station, or other public place.



# Additional Eligibility Requirements for Specific Program Options:

Applications for the Discovery Center EHS, Olympic College EHS, Olympic College HS and home based EHS options are handled by the designated enrolling staff as site specific eligibility criteria apply:

- ★ Discovery EHS Center: Eligible applicants must be a pregnant or parenting student enrolled at the Discovery Alternative School.
- ★ Discovery EHS Home Based option: Eligible applicants must be a pregnant or parenting student in the South Kitsap school district. The Discovery Early Head Start Home Visitor may also enroll from the Givens EHS wait list and from the community when no eligible Discovery and SK schools wait list is exhausted.
- ★ Olympic College EHS: Parent must be enrolled as an Olympic College student. Community applicants may be considered if the center has exhausted all possibilities of enrolling an OC student.
- ★ Olympic College HS: Parent must be enrolled as an Olympic College student. Community applicants may be considered if the center has exhausted all possibilities of enrolling an OC student.
- ★ Pregnancy to Employment/Holly Ridge Center home based option: Applicant must be receiving income from a TANF funded program including but not limited to the Pregnancy to Employment program. Participants from Holly Ridge must have an active IFSP.

# HEAD START AND EARLY HEAD START INCOME ELIGIBILTY REQUIREMENTS

### Head Start PS 1302.12

In **Head Start** and **EHS**, income eligibility must be verified using the time period below that best reflects the family's current financial circumstances

- Previous calendar year before enrollment
- Twelve months before enrollment

Exceptions: (OHS-PC-I-008) Previous or current month may be used, when annual family income has been documented and recent income is significantly decreased due to death, divorce, unexpected job loss or similar circumstance. If the monthly income is at or below the required Federal Poverty Guidelines of the program option, the family will not be counted as over-income. In this situation the file needs a signed statement by an employee of the program identifying the documents examined, an explanation of what data was used to determine eligibility, the program's justification for determining the child is income eligible and a statement that the child is eligible to participate in the program.

### Head Start Definition of Family

In Head Start/ Early Head Start: Family means all persons living in the same household who are: (1) supported by the income of the parent(s) or guardian(s) of the child enrolling or participating in the program, and (2) related to the parent(s) or guardian(s) by blood, marriage or adoption



The following counts as income in the above definition of family:

- Wages or salary before taxes and deductions for all adults.
- Net income from self-employment for all adults.
- Regular payments from Social Security or railroad retirement, and veteran's benefits, (with the exception of certain payments made to disabled children of Vietnam veterans as prescribed by the Secretary of Veterans Affairs.)
- Payments from unemployment compensation, workers' compensation, strike benefits from union funds
- Public assistance (including Temporary Assistance for Needy Families, SSI, Emergency Assistance money payments, and non-Federally funded General Assistance or General Relief money payments)
- Alimony, child support and military family allotments or other regular support from an absent family member or someone not living in the household, private pension's government employee pensions (including military retirement pay) and regular insurance or annuity payments.
- Training stipends, college or university scholarships, grants, fellowships, and assistantships and dividends, interest, net rental income, net royalties and periodic receipts from estates or trusts and net gambling or lottery winnings

# MILIRARY INCOME PROCEDURES FOR INCOME ELIGIBILITY

### Head Start/ Early Head Start:

The following 2 pay allowances are to be excluded when determining Head Start eligibility:

- The amount of any special pay payable under Section 310 of Title 37, United States Code, relating to duty subject to hostile fire or imminent danger.
- The amount of basic allowance payable under Section 403 of Title 37, including any housing allowance. (Please see Section 645(a)(3)(ii) of the Head Start Act for the full statuary language)

In addition, under 37 U.S.C. 402 a (g), the child or spouse of a member of the armed forces receiving a "supplemental subsistence allowance" who, except on account of such allowance, would be eligible to receive a service provided under the Head Start Act, shall be considered eligible for such benefits notwithstanding the receipt of the allowance. The subsistence allowance would therefore not be counted in determining eligibility for programs authorized by the Head Start Act.

## **RECRUITMENT**

It is a requirement that you conduct on-going and aggressive recruitment efforts every month in collaboration with the Family Services Coordinator and Coordinator Assistant, and other family services staff, Policy Council and Kitsap Community Resources (KCR) in order to maintain up-to-date wait lists so that you can fill vacancies immediately with eligible children and families.



Recruitment is the systematic, year round outreach to our service areas to identify potentially eligible families and provide them information about the Head Start/EHS/ECEAP program. The most urgent recruitment needs are indicated by the yearly Community Assessment. The process of recruiting occurs in a number of ways and includes community education, displays of fliers, program inquiry forms and brochures in businesses, schools, social service agencies and neighborhoods and by the physical presence of staff at appropriate community and school events. The most effective recruitment occurs when an eligible family has a positive encounter with Head Start/EHS/ECEAP family.

Recruitment is also the work done with the pool of eligible applicants to give further information about program options and to assist their application. Performance Standards clearly indicate we have an obligation to assist in completing paperwork.

#### Non-Discrimination:

It is the policy of the Olympic ESD 114 to maintain a recruitment process that insures eligible families are enrolled regardless of race, color, national origin, citizenship, culture, gender, sexual orientation, family configuration, religion or physical or mental disability. Our services comply with the ADA and Family Policy Initiative principles defined in RCW 74.14A.025.

Translation assistance and interpretation services may be provided when needed.

### **OUTREACH TO CHILDREN FROM LOW INCOME FAMILIES**

In accordance with the Head Start Act, (section 645), recruitment includes efforts to identify children from low income families whose incomes are at or below the 100% of the federal poverty level.

## **OUTREACH TO HOMELESS CHILDREN**

In accordance with Head Start and ECEAP Performance Standards, recruitment includes efforts to identify eligible homeless children, as defined by the federal McKinney-Vento Homeless Assistance Act. To quote the Act, this includes children who:

- Lack a fixed, regular, and adequate nighttime residence
- Share housing of other persons due to loss of housing, economic hardship, or similar reason
- Live in motels, hotels, temporary trailers, or campgrounds
- Live in emergency or transitional shelters
- Are abandoned in hospitals
- Are awaiting foster care placement



# **SEVICE AREA AGREEMENT**

Annually, the Early Learning department on behalf of the Olympic Educational Service District 114 will work with the Kitsap Interagency Coordinating Council (KICC), comprised of Kitsap Community Recourses, Suquamish Tribe and Port Gamble S'Klallam Tribe, to generate a Service Area Agreement that outlines which agency is responsible for administering specific program options within designate catchment or geographic areas within Kitsap County.

#### **Catchment Area for HS, ECEAP, and EHS Services**

The following list refers to elementary school catchment areas:

Bremerton School District	
Naval Avenue Elementary	KCR
Crown Hill Elementary	KCR
West Hills Elementary	KCR
Armin Jahr Elementary	KCR
View Ridge Elementary	KCR
Kitsap Lake Elementary	KCR
Olympic College	OESD 114
Renaissance/Open Doors	OESD 114
Central Kitsap School District	
Clear Creek Elementary	OESD 114
John D. "Bud" Hawk (Jackson Park) Elementary	OESD 114
Brownsville Elementary	OESD 114
Cottonwood Elementary	OESD 114
Esquire Hills Elementary	OESD 114
Silverdale Elementary	KCR
Woodlands Elementary	OESD 114
Cougar Valley Elementary	OESD 114
Silver Ridge Elementary	OESD 114
Green Mountain Elementary	OESD 114
Emerald Heights Elementary	KCR
PineCrest Elementary	OESD 114
North Kitsap School District	
Vinland Elementary	KCR
Pearson Elementary	KCR
Poulsbo Elementary	KCR
Suquamish Elementary	Suquamish
Wolfle Elementary	OESD 114-PG/SK
Gordon Elementary	OESD 114-PG/SK
Port Gamble/S'Klallam Indian Tribe	PG/SK
Suquamish Indian Tribe	Suquamish



#### South Kitsap School District

Madrona Heights Elementary	OESD 114
Burley Glenwood Elementary	OESD 114
East Port Orchard Elementary	OESD 114
Hidden Creek Elementary	OESD 114
Manchester Elementary	OESD 114
Mullenix Ridge Elementary	OESD 114
Olalla Elementary	OESD 114
Orchard Heights Elementary	OESD 114
Madrona	OESD 114
Sidney Glen Elementary	OESD 114
South Colby Elementary	OESD 114
Sunnyslope Elementary	OESD 114
Discovery Alternative High School (EHS)	OESD 114
Bainbridge Island School District	
Blakely Elementary	KCR
Ordway Elementary	KCR
Captain Charles Wilkes Elementary	KCR

#### **SELECTION**

When a family contacts the program for the first time, staff completes a Selection Criteria Worksheet for each family. It is important that this be verified by a family advocate as this score places each family on the wait list by priority of highest score, providing assurance that our program is serving the most in need. Selection Criteria are derived from the Community Needs Assessment and community trends to assure we are basing our services on those with the highest need in our community. Families are then enrolled according to their placement on the wait list at the location of their preference for enrollment.

## WAIT LIST APPLICATIONS PROCEDURES

Each family advocate, home visitor, Child Care Connections partner or Head Start or Early Head Start Contractor will maintain their own wait list, and assure that the lists are prioritized according to the highest number of points being the first eligible for openings. Staff are also required to establish a regular system of updating to keep names current, and contacting their waitlists. ECEAP family advocates must be especially attentive to their wait lists to assure an adequate number of 4 year olds are available should openings occur.



# **ENROLLMENT**

### Refer to selection criteria and eligibility guidelines prior to enrollment.

For all program options, enrolling staff review intake applications for their site(s) or program option, and offer enrollment opportunities according to the program selection criteria and placement on the wait list. Enrolling staff must try and reach the family according to the selection criteria of the program option. The efforts taken to contact the family should be documented on intake application.

Reasonable efforts should be made for a family to respond to the program before proceeding to the next family on the list. If a phone is disconnected, enrolling staff should send a letter asking for updated contact information so the next enrollment opportunity will not be missed.

Enrollment appointments take place in the family's primary language. Translation assistance can be arranged by contacting a Family Services Coordinator. Professional assistance is recommended over translation by a friend or relative. Allow extra time when a translator is used.

Due to the confidential nature of the information, every effort should be made to ensure the enrollment appointment is private.

### The enrollment appointment:

- 1. Verify income
- 2. Forms and Information Completion
- 4. Family and Staff Partnership Information Shared

Enrollment marks the formal beginning of family and program partnership. Enrolling staff facilitate a strength-based relationship with the family and introduce the family to the idea of partnership. Each parent and guardian must be made aware they are a vital part of the governance, curriculum, planning and everyday operation of the site and HS/EHS/ECEAP program.

Introduce families to opportunities for family involvement, including the classes listed on The Invitation to be involved. Encourage families to think of ways they might contribute to their children and family's well-being and educational growth while enrolled with the program.



### FULL ENROLLMENT

- All Head Start sites <u>must be fully enrolled on the day designated as the first day of the program</u> <u>year which is September 30th</u>. If the predominate age of the children in the class is PY 4 and PY 5 then no more than 20 children can be in the class. If the predominant age of the children in the class is PY 3 then no more the 17 children can be in the class. All vacancies must be enrolled from the wait list somewhere within the program within 30 calendar days of the last date of service for the vacancy so the Head Start funded enrollment level is maintained. Vacancies less than 30 days in duration are counted as an enrolled slot.
- Full day full year Head Start/Early Head Start and home based options <u>must be fully enrolled</u> <u>during the entire operating year</u>. All vacancies must be enrolled from the wait list somewhere within the program within 30 calendar days of the last date of service for the vacancy. Vacancies less than 30 days in duration are counted as an enrolled slot.
- ECEAP must fill 100% of the Funded Enrollment Level within 30 calendar days after children's classes begin and maintain a monthly active enrollment of 95% of funded slots filling vacancies from the waiting lists as they occur.
- If the wait list does not provide an eligible child for enrollment, the enrolling staff must take immediate action by contacting other enrolling staff to begin extraordinary targeted recruitment efforts. (See Recruitment Procedures)

In both Head Start and ECEAP part year programs, it is required that the program recruit and fill new vacancies until 60 calendar days before the children's classes end for the school year.



## INCOME VERIFICATION GUIDELINES

In accordance with Head Start and ECEAP Performance standards, the Head Start/EHS/ECEAP program must verify family income **before** determining that a child is eligible to be enrolled.

At least 90% of the children enrolled in the program must be from low-income families. "Low-income" means a family whose total income before taxes for the prior twelve months or prior calendar year, whichever period more accurately reflects the current income of the family, is equal to, or less than, federally established poverty guidelines.

- ECEAP programs qualify families whose income is at or below 110%.
- Head Start/Early Head Start programs qualifies families whose income is at or below 100% of the U.S. Poverty Guidelines.

### Definition of Family used to determine income eligibility

#### Head Start: PS 1302.1

Family means all persons living in the same household who are: (1) supported by the income of the parent(s) or guardian(s) of the child enrolling or participating in the program, and (2) related to the parent(s) or guardian(s) by blood, marriage or adoption

#### ECEAP: PS B-14

Family means all persons living in the household with the ECEAP child who share finances and are related to the child's parent by blood, marriage adoption or legal obligation to provide support.

For families temporarily sharing housing with relatives or others do not count the host.

### VERIFYING INCOME

Verification of income must include examination of any of the following:

- Income Tax Form 1040 from the most recent tax year
- W-2 Forms from the most recent tax year
- Pay stubs covering the prior 12 months (whenever possible)
- LES (Military pay) covering the prior 12 months (whenever possible)
- Written statements from employers verifying income

Documentation showing current status as recipients of public assistance

- Families receiving cash benefits under Temporary Assistance to Needy Families (TANF) program will be automatically eligible for enrollment.
  - If family is unable to produce a grant letter or current documentation of TANF number, the enrolling staff will send a *Request for TANF Payment* to DSHS to verify income. The secretary will send a *Request for TANF Income Verification* to families enrolling in ECEAP who indicate they are receiving TANF. This letter must be placed in the ECEAP family file.



<u>Entering an Income Figure:</u> For Head Start/Early Head Start Only: Mark Public Assistance Verification and enter the TANF cash grant benefit or child care subsidy Client ID #. Income received prior to the granting of TANF benefits need not be considered for income verification purposes.

# **AUTOMATIC ELIGIBILITY**

Families (Head Start/EHS programs only) receiving "Non-Episodic Benefits or Services" currently Funded under the Authority of TANF are automatically eligible for enrollment. As of May 31, 2003 these services and/or benefits are:

- Comprehensive Program for Alcohol and Drug-Abusing Mothers and Their Young Children,
- Parent Child Assistance Program (DASA),
- Post-Employment Services up to 6 months post-TANF,
- Working Connections Child Care,
- Workplace Basic Skills,
- Work-Based Tuition Assistance,
- Families That Work,
- Pre-Employment Training,
- Post-Employment Services, and
- Individual Development Accounts.
- Income documentation must be reviewed by enrolling staff who will sign the child enrollment or EHS enrollment form attesting how income has been verified. Income verification documents should be returned to the family. Copies of the documentation should **not** be kept in the family file.
- If a family declares they had no income during the past calendar year of the 12 months preceding enrollment, have them complete the Declaration of No Income Form. This form stays in the family file.
- If a family has no documentation showing income eligibility the supervisor and Family Services Coordinator should be contacted for instruction.
- In Head Start/Early Head Start only: If a family has been selected for enrollment at a full day Site and is in the process of obtaining a Working Connections Child Care subsidy *and* the enrolling staff has obtained a verbal assurance that the family will qualify for the subsidy, they can enroll the child as long as the verbal assurance came from the DSHS case worker. However, as soon as paperwork is completed, it should be recorded in the child file.
- In Head Start/Early Head Start only: Children who are considered homeless according to the McKinney-Vento Act are automatically eligible. Verification and documentation of these circumstances are required to obtain within a reasonable time frame. Documentation and verification could include an enrollment completed in the home or a home visit conducted in the home to verify living situations. This must be documented in the action log. Other documentation could include written verification from homeless service agencies, school district homeless liaisons and private and public shelter providers.
- In ECEAP classes only: The income for children, who are homeless in accordance with the McKinney-Vento Homeless Act, must be documented within 90 calendar days of enrollment. (ECEAP Standard B-6)
- In ECEAP classes only: A copy of a current TANF award letter must be maintained in the enrollment section of the family file. It is sufficient to verify monthly, rather than annual, income for families



receiving TANF cash benefits. Use the TANF Verification letter to obtain a current TANF award letter for the family file if needed.

- In ECEAP classes only: Children in Foster Care: Enrolling staff will verify case number and DSHS grant amount. Monthly amount and number of children on grant will be documented on CEF. Family income must be re-verified when the child:
  - Transfers from a Head Start site to an ECEAP site, or ECEAP site to Head Start site
  - Is a sibling of a child previously enrolled in an OESD program
  - Is transferring from an Early Head Start Program to a Head Start or ECEAP preschool or care option
  - Is a Head Start child enrolling for a third year of Head Start services

### Family income *does not* need to be re-verified when a child:

- Is a Head Start or ECEAP child enrolling for a second year of Head Start/ECEAP services
- Is transferring from an OESD Head Start site to another OESD Head Start site or from one EHS site to another EHS site within the OESD program
- Is transferring from active participation in a Kitsap Community Resources Head Start program directly to an OESD 114 Head Start option
- Is transferring from *active* participation in another Head Start program directly to an OESD 114 Head Start option.