

# **Early Learning Ventures EHS Service Plan**

## **1302: Subpart J-Program Management and Quality Improvement**

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## **1302: Subpart J – Program Management and Quality Improvement**

### **1302.100 Purpose**

#### **Performance Standard:**

A program must provide management and a process of ongoing monitoring and continuous improvement for achieving program goals that ensures child safety and the delivery of effective, high-quality program services.

#### **Policy and Procedures:**

The process outlined throughout this *Program Management and Quality Improvement service* plan demonstrates ELV's management approach which includes ongoing monitoring of continuous improvement tools to support the pursuit of both short and long-term program goals. ELV's management model ensures an effective delivery of high-quality services and child safety.

The annual EHS Baseline and Continuation Application structure offers the opportunity to establish or reestablish program goals as the grantee with school readiness and Parent, Family and Community Engagement Goals embedded within. These goals are informed by the annual self-assessment process and resulting action plan to guide this internal continuous improvement process for program management.

Additionally, site specific Continuous Improvement Plans (CIP) are established annually with EHS Child Care Partners and managed within ELV's Alliance CORE data management system. The CIP objectives for child care partners are based on HSPPS (Part 1302-Program Operations) and the use of the CIP is facilitated by the assigned ELV Child Care Partnership Specialist in partnership with Child Care Partner site leadership. ELV Specialists conduct regular check-ins with site leadership to review progress toward objectives and milestones within the CIP and stay informed while verifying through observation and documentation.

## **1302: Subpart J – Program Management and Quality Improvement**

### **1302.101 Management System**

#### **Performance Standard:**

**Implementation** – A program must implement a management system that:

- Ensures a program, fiscal, and human resource management structure that provides effective management and oversight of all program areas and fiduciary responsibilities to enable delivery of high-quality services in all of the program services described in subparts C, D, E, F, G, and H of this part;
- Provides regular and ongoing supervision to support individual staff professional development and continuous program quality improvement;
- Ensures budget and staffing patterns that promote continuity of care for all children enrolled, allow sufficient time for staff to participate in appropriate training and professional development, and allow for provision of the full range of services described in subparts C, D, E, F, G, and H of this part; and,
- Maintains an automated accounting and record keeping system adequate for effective oversight.

#### **Policy and Procedures:**

ELV maintains a Fiscal Manual that describes all fiscal policies and procedures that are practiced and implemented.

ELV ensures effective management and oversight regarding all program areas and fiscal responsibilities, as outlined throughout the entire service plan. ELV utilizes Alliance CORE, myTeachstone and TS Gold Online for record-keeping of program services and child/family information.

Refer to the Training and Professional Development: 1302.92 Subpart I—Human Resources Management section for detail on how professional development is carried out at Early Learning Ventures.

As an EHS-CCP grantee ELV provides budget management guidance and support for Child Care Partners to implement effective staffing patterns, including primary caregiving and continuity of care practices within their programs. ELV Child Care Partnerships Specialists provide insight and site-specific coaching for both site leadership and Early Head Start Teachers, documented in Alliance CORE, to support the subparts mentioned above.

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### 1302.101 Management System

#### Performance Standard:

***Coordinated Approaches*** – At the beginning of each program year, and ongoing, a program must design and implement program-wide coordinated approaches that ensure: The training and professional development system, as described in 1302.92 effectively supports the delivery and continuous improvement of high-quality services;

- The full and effective participation of dual language learners and their families, by:
  - Utilizing information from the program’s community assessment about the languages spoken throughout the program service area to anticipate child and family needs;
  - Identifying community resources and establishing ongoing collaborative relationships and partnerships with community organizations consistent with the requirements in 1302.53a (Subpart E—Family/Community Engagement); and,
  - Systematically and comprehensively addressing child and family needs by facilitating meaningful access to program services, including, at a minimum, curriculum, instruction, staffing, supervision, and family partnerships with bilingual staff, oral language assistance and interpretation, or translation of essential program materials, as appropriate.
- The full and effective participation of all children with disabilities, including but not limited to children eligible for services under IDEA, by providing services with appropriate facilities, program materials, curriculum, instruction, staffing, supervision, and partnerships, consistent with the Americans with Disabilities Act; and,
- The management of program data to effectively support the availability, usability, integrity, and security of data. A program must establish procedures on data management, and have them approved by the governing body and policy council, in areas such as quality of data and effective use and sharing of data, while protecting the privacy of child records in accordance with subpart C of part 1303 of this chapter and applicable federal, state, local, and tribal laws.

## 1302: Subpart J – Program Management and Quality Improvement

### Policy and Procedures:

Please refer to the corresponding ELV Service Plans for an explanation of how the above Standards are met:

- 1302.90 Subpart I—Human Resources Management
- 1302.50 Subpart E—Family and Community Engagement Program Services;
- 1302.60 Subpart F—Additional Services for Children with Disabilities
- 1303.22 Privacy of Child Records

Alliance CORE system security meets current regulatory standards for data security. EHS Participation requires a formal commitment by Child Care Partners to use the Alliance CORE system for program data.

### 1302.102 Achieving Program Goals

#### Performance Standard:

***Establishing Program Goals*** – A program, in collaboration with the governing body and policy council, must establish goals and measurable objectives that include:

- Strategic long-term goals for ensuring programs are and remain responsive to community needs as identified in their community assessment as described in subpart A of the Performance Standards.
- Goals for the provision of educational, health, nutritional, and family and community engagement program services as described in the program performance standards to further promote the school readiness of enrolled children;
- School readiness goals that are aligned with the Head Start Early Learning Outcomes Framework: Ages Birth to Five, state and tribal early learning standards, as appropriate, and requirements and expectations of schools Head Start children will attend, per the requirements of subpart B of part 1304 of this part (Designation Renewal); and,
- Effective health and safety practices to ensure children are safe at all times, per the requirements in 1302.47, 1302.90(b) and (c), 1302.92(c)(1), and 1302.94 and 1303 subpart F, of this chapter.

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### **Policy and Procedures:**

Upon completion of the Community Assessment every 5 years, the Director, Fiscal Officer, and Management Staff, along with the Governing Board of Directors and members of the Policy Council, will engage in strategic planning to develop short-term and long-term goals and measurable objectives which align with the needs of those living in poverty within the community. Staff and Governing Bodies review progress related to the strategic plan a minimum of three times a year, including after each annual update to the Community Assessment in Years 2-5.

School Readiness Goals have been developed which align with the Head Start Early Learning Outcomes Framework, State early learning standards and the expectations, as appropriate, of the local schools that children will eventually attend. Program services support both family and child outcomes. Progress toward School Readiness Goals is reviewed a minimum of 3 times per year. School Readiness Goals are reviewed annually to ensure continued alignment with national and state entities; such goals will then be adjusted if necessary.

Please also refer to ELV's service plan for 1302.40 Subpart D-Health Program Services, and the ELV Strategic Plan.

## 1302: Subpart J – Program Management and Quality Improvement

### 1302.102 Achieving Program Goals

#### Performance Standard:

***Monitoring Program Performance: On-going Compliance, Oversight, and Correction*** - In order to ensure effective ongoing oversight and correction, a program must establish and implement a system of ongoing oversight that ensures effective implementation of the program performance standards, including ensuring child safety, and other applicable federal regulations and must:

- Collect and use data to inform this process;
- Correct quality and compliance issues immediately, or as quickly as possible;
- Work with the governing body and the policy council to address issues during the ongoing oversight and correction process and during federal oversight; and,
- Implement procedures that prevent recurrence of previous quality and compliance issues, including previously identified deficiencies, safety incidents, and audit findings.

#### Policy and Procedures:

The program engages in a process of on-going monitoring, compliance, oversight, and correction. The collection and use of data is a significant focus of on-going monitoring of compliance and necessary corrections. Management staff communicates significant quality and compliance issues with both the EHS Governing Board and the Policy Council. ELV implements a CIP and noncompliance process with Child Care Partners that is intended to prevent recurrence of previous quality and compliance issues, including previously identified deficiencies, safety incidents, and audit findings. In addition, ELV follows corrective action guidance from the Office of Head Start regarding any identified area of concern, noncompliance or deficiency on the part of the grantee.

Please refer to ELV's 1302.102 Appendix - EHS Noncompliance.

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### 1302.102 Achieving Program Goals

#### Performance Standard:

***Ongoing Assessment of Program Goals*** - A program must effectively oversee progress towards program goals on an ongoing basis and annually must:

- Conduct a self-assessment that uses program data including aggregated child assessment data, and professional development and parent and family engagement data as appropriate, to evaluate the program's progress towards meeting goals established under paragraph (a) of this section, compliance with program performance standards throughout the program year, and the effectiveness of the professional development and family engagement systems in promoting school readiness;
- Communicate and collaborate with the governing body and policy council, program staff, and parents of enrolled children when conducting the annual self-assessment; and,
- Submit findings of the self-assessment, including information listed in paragraph (b)(2)(i) of this section to the responsible HHS official.

#### Policy and Procedures:

ELV engages in an annual self-assessment process to guide internal continuous improvement. Staff work together to plan an assessment typically based on current Head Start Monitoring Protocols and/or other best practices every winter. The data collection process typically runs through the spring annually. Program Management invites program staff, child care partners, Policy Council members, EHS Governing Board members, and parent committees to participate in planning and conducting this process. The process includes surveys, interviews, group discussion and data analysis.

A summary of the information collected and a resulting action plan are presented to Policy Council and the EHS Governing Board each April for review, feedback and approval. ELV compiles and submits the summary of the self-assessment and resulting action plan to the Office of Head Start as a part of the annual Baseline or Continuation Application. The summary and action plan include strengths, challenges, and steps for continuous improvement.

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### 1302.102 Achieving Program Goals

#### Performance Standard:

**Using Data for Continuous Improvement** - A program must implement a process for using data to identify program strengths and needs, develop, and implement plans that address program needs, and continually evaluate compliance with program performance standards and progress towards achieving program goals. This process must:

- Ensure data is aggregated, analyzed, and compared in such a way to assist agencies in identifying risks and informing strategies for continuous improvement in all program service areas;
- Ensure child-level assessment data is aggregated and analyzed at least three times a year, including for sub-groups, such as dual language learners and children with disabilities, as appropriate, and used with other program data to direct continuous improvement related to curriculum choice and implementation, teaching practices, professional development, program design and other program decisions, including changing or targeting scope of services;
- Use information from ongoing monitoring and the annual self-assessment, and program data on teaching practice, staffing and professional development, child-level assessments, family needs assessments, and comprehensive services, to identify program needs, and develop and implement plans for program improvement; and,
- Use program improvement plans as needed to either strengthen or adjust content and strategies for professional development, change program scope and services, refine school readiness and other program goals, and adapt strategies to better address the needs of sub-groups.

#### Policy and Procedures:

After the completion of the Community Assessment every 5 years, program management and shared governance engage in strategic planning to develop program goals and measurable objectives which align with the needs of those living in poverty within the community. Strategic goals and measurable objectives are developed to specifically support educational, health, nutritional, and family and community engagement program services that positively impact children's school readiness outcomes. The community assessment is updated each year using *Kids Count* and other relevant Colorado data in order to inform the annual process.

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School Readiness Goals have been developed which align with the Head Start Early Learning Outcomes Framework, state early learning standards and the expectations of the local schools that Early Head Start children will eventually attend. Progress toward School Readiness Goals is reviewed a minimum of three times per year. Annually, School Readiness Goals are reviewed to ensure continued alignment with national, state, and local standards; such goals will be adjusted prior to the next program year, if necessary.

The Program has implemented a process for collecting, aggregating, and analyzing agency-wide data throughout the program year. Program management reviews the program dashboard monthly that reflects progress toward program goals and objectives. This dashboard and other associated reports are shared with the Policy Council and EHS Governing Board monthly.

The self-assessment process described the *Ongoing Assessment of Program Goals* is also a part of this informed decision making process.

### 1302.102 Achieving Program Goals

#### **Performance Standard:**

**Reporting** - A program must submit:

- Status reports, determined by ongoing oversight data, to the Governing Body and Policy Council, at least semi-annually;
- Reports , as appropriate, to the responsible HHS official immediately or as soon as practicable, related to any significant incidents affecting the health and safety of program participants, circumstances affecting the financial viability of the program, breaches of personally identifiable information, or program involvement in legal proceedings, any matter for which notification or a report to state, tribal, or local authorities is required by applicable law, including at a minimum:
  - Any reports regarding agency staff or volunteer compliance with federal, state, or local laws addressing child abuse and neglect or laws governing sex offenders;
  - Incidents that require classrooms or centers to be closed for any reason;

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- Legal proceedings by any party, directly related to program operations; and,
- All conditions required to be reported under 1304.12, including disqualification from the Child and Adult Care Food Program (CACFP) and license revocation.

### Policy and Procedures:

The Board of Directors and Policy Council are given status reports monthly and reviewed at bi-monthly governance meetings. If concerns arise in any content area, the frequency of reporting will increase as necessary. Status reports include data, *at a minimum* as noted below, which allows on-going oversight by the EHS Governing Board and Policy Council.

Content Area	Data Reports	Minimum Frequency
Fiscal	Financials/Non-Federal Share	Bi-monthly
ERSEA	Monthly Enrollment	Bi-monthly
ERSEA	Attendance	Bi-monthly
ERSEA	Demographic Overview	Annually
Disabilities	Percent of Enrolled Children	Bi-monthly
Education/Health	Developmental Screenings (45 days)	Bi-monthly
Education	Child Outcomes	Bi-monthly
Family Engagement	Family Outcomes	Bi-monthly
Health	Health Status (i.e. obesity, health conditions, immunizations, insurance, etc. per PIR)	Annually
Mental Health	Services, Referrals and Follow-up	Annually
Oral Health	Services, Referrals and Follow-up	Annually
Variety	PIR Annual Report	Annually

ELV will promptly submit reports to the responsible HHS official related to any significant incidents affecting the health and safety of children; circumstances affecting the financial viability of the program; breaches of personally identifiable information; program involvement in legal proceedings; or any matter for which notification or a report to state, or local authorities is required by law.

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### 1302.102 Achieving Program Goals

#### Performance Standard:

**Reporting** - Annually, a program must publish and disseminate a report that complies with section 644(a)(2) of the Head Start Act and includes a summary of a program's most recent community assessment.

#### Policy and Procedures:

The Program makes an annual report available to the public at least once in each fiscal year that discloses the most recently concluded fiscal year. The ELV fiscal year concludes on December 31 annually, and the release of the annual report is planned for each publication by July after fiscal year data compilation and analysis has been conducted. Reporting of such information does not reveal personally identifiable information about any individual child or parent (1301, subpart C). Per section 644(a)(2) of the Act, the Annual Report will include:

- The total amount of public and private funds received and amount from each source;
- An explanation of budgetary expenditures and proposed budget for the fiscal year;
- The total number of children and families served, average monthly enrollment (as a percentage of funded enrollment), and the percentage of eligible children served;
- The results of the most recent review by the Secretary and the financial audit;
- The percentage of enrolled children that received medical and dental exams;
- Information about parent engagement activities;
- The agency's efforts to prepare children for kindergarten;
- Any other information required by the Secretary of HHS; and
- A summary of the most recent community assessment, as described in 1302.11(b)

#### Performance Standard:

**Reporting** - If a program has had a deficiency identified, it must submit, to the responsible HHS official, a quality improvement plan as required in section 641A(e)(2) of the Act.

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### **Policy and Procedures:**

Per the Head Start Act, the program will submit a quality improvement plan to HHS in a timely manner if a deficiency is identified. The plan will specify:

- Deficiencies to be corrected;
- Actions to be taken to correct such deficiencies;
- Timetable for accomplishment of the corrective actions specified; and
- Documentation of progress through the quality improvement plan as requested.

The program will correct each deficiency identified no later than the date for correction specified in such a plan, which may be no later than one year after the date the program received notice of the specific deficiency to be corrected.

### **1302.103 Implementation of Program Performance Standards**

#### **Performance Standard:**

A current program as of November 7, 2016, must implement a program-wide approach for the effective and timely implementation of the changes to the program performance standards, including the purchase of materials and allocation of staff time, as appropriate. A program's approach to implement the changes included in parts 1301 through 1304 of this chapter must ensure adequate preparation for effective and timely service delivery to children and their families including, at a minimum, review of community assessment data to determine the most appropriate strategy for implementing required program changes, including assessing any changes in the number of children who can be served, as necessary, the purchase of and training on any curriculum, assessment, or other materials, as needed, assessment of program-wide professional development needs, assessment of staffing patterns, the development of coordinated approaches described in 1302.101(b), and the development of appropriate protections for data sharing; and children enrolled in the program on November 7, 2016 are not displaced during a program year and that children leaving Early Head Start or Head Start at the end of the program year following the publication of this rule as a result of any slot reductions received services described in 1302.70 and 1302.72 to facilitate successful transitions to other programs.

#### **Policy and Procedures:**

ELV uses a variety of tools to ensure timely implementation of program performance standards. This includes a Child Care Partnership site specific Continuous Improvement

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Plan within Alliance CORE, where Specialists enter monthly checkpoints documenting progress by Child Care Partner sites towards objectives aligned with HSPPS, as well as annual renewal meetings where Program Management meets with each Child Care Partner and shares information on updated program priorities or changes. As described in previous sections, ELV will follow all Head Start Program Performance Standards according to the timelines outlined by the Office of Head Start, unless a waiver request is submitted and approved.

ELV's Program Management staff review community assessment data and service plans annually to ensure they are current and include all HSPPS updates.

ELV also conducts an annual self-assessment guided by Office of Head Start Monitoring Protocols as detailed in previous sections. Self-assessment data is collected through collaboration between ELV staff, Child Care Partner Staff, Governing Board membership, Policy Council membership, and community partners. Next, data summary and analysis is conducted by program management and is used to develop an action plan which guides the program's continuous improvement efforts throughout the program year. This plan is reviewed with Governance Groups in an effort to gain feedback and approval before including with annual continuation or baseline OHS applications.

### **1302.103 Implementation of Program Performance Standards**

Policy Council Approval: October 11, 2021

Governing Board Approval October 20, 2021