



## The Triennial On-site Federal Monitoring Review

### *An Overview*

Each grantee must submit to an on-site federal monitoring review after the first full year of providing Head Start services, and again at least every three years thereafter. These triennial reviews includes interviews with the director, management and key staff, observations, and reviews of child and staff files as well as other grantee documents. Grantee performance is evaluated using key indicators in seven domains of program administration and service provision:<sup>1</sup>

- Program governance
- Management systems
- Fiscal integrity
- Eligibility, recruitment, selection, enrollment, and attendance
- Child health and safety
- Family and community engagement
- Child development and education. For center-based programs, the child development and education domain includes an assessment of teacher-child interaction and classroom quality using the [Classroom Assessment Scoring System \(CLASS\)](#).

Key indicators were developed using past monitoring data, compliance and non-compliance data, policy development review, research on best indicators of quality and content experts.<sup>2,3</sup> It is important to note that the main goal of the on-site federal monitoring review is to ensure compliance with all program performance standards;<sup>4</sup> therefore, the review is designed to detect major quality gaps but not to capture a fine grained picture of quality for each grantee. The exception to this is the accompanying CLASS assessment of classroom quality, which assesses classroom environment and teacher-child interactions.

If a grantee does not meet program requirements in any one of the above domains, it is deemed to be noncompliant or deficient.

- A noncompliance occurs when a grantee is out of compliance with one or more state or federal regulations/requirements, but in ways that do not constitute a deficiency. In this case, the grantee must correct the noncompliance within a specified timeframe; otherwise it will be considered a deficiency. Noncompliant findings in the Fiscal Year 2009 Head Start Monitoring report were related to staff performance appraisals, staff qualifications, and facility maintenance and repair, among other standards.<sup>5</sup>
- A deficiency “reflects a very serious program violation”<sup>6</sup> and occurs when a grantee violates state or federal regulations in one of the following areas:<sup>7</sup>
  - “A threat to the health, safety, or civil rights of children or staff
  - A denial to parents of the exercise of their full roles and responsibilities related to program operations
  - A failure to comply with standards related to early childhood development and health services, family and community partnerships, or program design and management

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- The misuse of funds”
- “Loss of legal status [...] or financial viability, loss of permits, debarment from receiving Federal grants or contracts, or the improper use of Federal funds”
- An uncorrected noncompliance

For example, deficient findings in the Fiscal Year 2009 Head Start Monitoring report were related to staff criminal record checks prior to hiring, facility cleanliness, and maintenance and repair, among other standards.<sup>8</sup> Depending on the type of deficiency, grantees are required to correct the issues immediately, or within a specified timeframe that may not exceed one year using a Quality Improvement Plan. Deficiencies requiring immediate corrective action, called immediate deficiencies, include:<sup>9</sup>

- Fiscal issues: “fraud, misuse, or falsification of fiscal records”
- Health issues: unsanitary conditions, contamination of food, significant medical issues without follow-up care
- Safety issues: lack of staff criminal background checks, maltreatment of children, or “imminent risk of injury or death to children or staff”

Uncorrected immediate deficiencies may lead to temporary suspension of the program until the issues are resolved, termination of the program, or denial of refunding. Deficiencies under a Quality Improvement Plan that are not corrected within the specified timeframe may lead to termination of the program or denial of refunding. Follow-up reviews for Head Start agencies with one or more deficiencies are conducted within 6 to 12 months of the findings. Additional reviews for all Head Start agencies, such as unannounced site inspections, form part of the monitoring process as well.

Grantees with deficiencies or noncompliances do receive additional support from the Office of Head Start (OHS) to address identified problems or areas of concern. This assistance is provided by regionally deployed Grantee Specialists, technical assistance (TA) personnel who work with grantees that have been identified by the Office of Head Start as needing additional assistance. Grantee Specialists provide TA specifically in the domain of management systems (including governance, reporting, funding issues, etc.). Head Start grantees interested in or needing additional support in early childhood education domains such as school readiness, parent, family and community engagement, staff development, and collaboration can tap into a larger network of technical assistance through OHS Early Childhood Education (ECE) Specialists.<sup>10</sup>

The on-site monitoring review has undergone significant modifications over the past decade. Importantly, in recent years OHS has incorporated a more proactive approach to quality improvement by highlighting key strengths of grantees in the review, rather than just deficiencies. Below is a review of some of these changes.

#### 2006-2008:<sup>11</sup>

- OHS established a new **centralized process for scheduling and planning** all first year and triennial monitoring reviews.
- OHS increased the **professional qualification requirements** for reviewers and implemented policies preventing reviewers to review programs in their home states.
- OHS implemented **monitoring software** to facilitate the collection, analysis and reporting of review findings in a more standardized and centralized manner.
- OHS shifted **quality control and compliance determination processes** from the regional

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offices to the OHS central office to ensure consistency across monitoring reviews.

- OHS emphasized **pre-site review planning** by increasing pre-site conversations with grantees and encouraging grantees to make documents available in advance.
- OHS released the **Monitoring Protocol** in the 2007 fiscal year, which is a compilation of compliance questions that cover all areas of the review. The Protocol was released to improved consistency and accountability of reviews.

## 2009:<sup>12</sup>

- OHS established a **centralized process for scheduling and planning** all follow-up monitoring reviews.
- OHS made **significant changes to the Monitoring Protocol**, including increased guidance in the types of questions reviewers must ask and answer in each type of review activity (interviews, observation, document and file review, etc.).
- OHS incorporated **program strengths** into monitoring reviews, as well as **concerns** that did not amount to a noncompliance or deficiency.
- OHS created new **streamlined procedures** for identifying and reporting an immediate deficiency or other identified concerns.
- OHS piloted the **CLASS instrument** for classroom quality in 2009, which is now fully implemented.

## 2012-2013:<sup>13</sup>

- OHS began emphasizing more time for **interviews**.
- OHS increased the **integration of the various elements** of the review (interviews, documents and observations).
- OHS modified the child development and education domain to **increase the focus on school readiness** (e.g. more in-depth review of development of school readiness goals, curriculum and curriculum implementation, individualization of services, and teaching quality).

### Sources & notes:

<sup>1</sup> Office of Head Start. (2013). *FY 2013 Office of Head Start monitoring protocol*. Administration for Children & Families, U.S. Department of Health and Human Services. Retrieved from [http://eclkc.ohs.acf.hhs.gov/hslc/mr/monitoring/fy2013pdf/FY2013\\_OHS\\_On-Site\\_Review\\_Protocol.pdf](http://eclkc.ohs.acf.hhs.gov/hslc/mr/monitoring/fy2013pdf/FY2013_OHS_On-Site_Review_Protocol.pdf).

<sup>2</sup> Brown, A. & Weaver, R. (2013). *FY 2013 monitoring webcast*. Office of Head Start, Administration for Children & Families, U.S. Department of Health and Human Services. Retrieved from <http://eclkc.ohs.acf.hhs.gov/hslc/mr/monitoring/fy2013pdf/000736-fy-2013-monitoring-grantee-webcast.pdf>.

<sup>3</sup> The Office of Head Start (OHS) Monitoring Protocol is continuously revised and updated. Prior to FY 2011, the OHS Monitoring Protocol was organized into a series of guides developed for each type of reviewer (education & early childhood development reviewer, fiscal management review, etc) and data collection method (observation, interview, document review, etc). In FY 2011, the OHS Monitoring Protocol was reorganized into eleven content areas and introduced 'Compliance Framework statements' which indicated key service delivery and performance objectives in each content area. In FY 2013, the organization of the OHS Monitoring Protocol was condensed into seven content areas and the Compliance Framework statements were revised with input from the OHS Quality Assurance Division and renamed 'Key Indicators'. The reorganization of the Monitoring Protocol in FY 2011 and onwards was designed to improve the integration of information collected in the monitoring reviews to get a better sense of the 'big picture' of how programs are performing. Sources: Office of Head Start (2013), op. cit.; Office of Head Start. (2010). *FY 2011 Office of Head Start monitoring protocol*. Administration for Children & Families, U.S. Department of Health and Human Services. Retrieved from [http://eclkc.ohs.acf.hhs.gov/hslc/mr/monitoring/fy2011pdf/FY2011\\_Monitoring\\_Protocol.pdf](http://eclkc.ohs.acf.hhs.gov/hslc/mr/monitoring/fy2011pdf/FY2011_Monitoring_Protocol.pdf); Office of Head Start. (2009). *FY 2010 Office of Head Start monitoring protocol guides*. Administration for Children & Families, U.S. Department of Health and Human Services. Retrieved from [http://spcaa.org/uploads/media/OHSMS\\_FY2010\\_Monitoring\\_Guides.pdf](http://spcaa.org/uploads/media/OHSMS_FY2010_Monitoring_Guides.pdf).

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<sup>4</sup> Office of Head Start, personal communication, August 23, 2013; Office of Head Start (2008). *Report to congress on Head Start monitoring: Fiscal year 2008*. Administration for Children and Families, U.S. Department of Health and Human Services. Retrieved from [http://eclkc.ohs.acf.hhs.gov/hslc/mr/rc/FY2008\\_Head\\_Start\\_Monitoring\\_Report.pdf](http://eclkc.ohs.acf.hhs.gov/hslc/mr/rc/FY2008_Head_Start_Monitoring_Report.pdf).

<sup>5</sup> Office of Head Start. (2009). *Report to Congress on Head Start monitoring: Fiscal year 2009*. Administration for Children and Families, U.S. Department of Health and Human Services. Retrieved from [http://eclkc.ohs.acf.hhs.gov/hslc/mr/rc/FY2009\\_Head\\_Start\\_%20Monitoring\\_Report.pdf](http://eclkc.ohs.acf.hhs.gov/hslc/mr/rc/FY2009_Head_Start_%20Monitoring_Report.pdf).

<sup>6</sup> Final rule: Head Start program. 76 Fed. Reg. (217), 70010 (Nov 9, 2011) (to be codified at 45 CFR Pt 1307).

<sup>7</sup> Office of Head Start. (2009), op. cit.

<sup>8</sup> Ibid.

<sup>9</sup> Ibid.

<sup>10</sup> The Head Start roadmap to excellence: The training and technical assistance system. (2010). Department of Health and Human Services. Retrieved from [http://eclkc.ohs.acf.hhs.gov/hslc/sr/quality/TTA\\_System\\_Roadmap\\_to\\_Excellence\\_090810.pdf](http://eclkc.ohs.acf.hhs.gov/hslc/sr/quality/TTA_System_Roadmap_to_Excellence_090810.pdf); Office of Head Start, personal communication, January 31, 2014.

<sup>11</sup> Ibid.

<sup>12</sup> Ibid.

<sup>13</sup> Brown (2013), op. cit.