

Eligibility, Recruitment, Selection, Enrollment & Attendance

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JFK Consultants

Objectives

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- To increase staff's understanding of ERSEA requirements as outlined in the Head Start Act of 2007, the Performance Standards and the Final Rule on Eligibility, effective March 12, 2015.
- To identify the components of a quality ERSEA system .
- To identify resources to support staff's knowledge of ERSEA requirements.

Welcome!

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ERSEA ACTIVITY

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Activity- Definitions

In your assigned group (Determined by puzzle piece color):

- ▶ Put the puzzle pieces together.
- ▶ Discuss the definition of your group's word.
- ▶ Select a member of your group to share with the large group your word and the definition.

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Why is ERSEA Important?

- ▶ Strengths and Needs
- ▶ Determine:
 - Program options
 - High need areas
 - Location of Centers
 - Selection Criteria
- ▶ Recruit the greatest number of children
- ▶ Recruit children and families with greatest need

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CFR PART 1305

Eligibility, Recruitment, Selection, Enrollment and Attendance in Head Start

- ▶ 1305.1 Purpose and scope
- ▶ 1305.2 Definitions
- ▶ 1305.3 Determining community strengths and needs
- ▶ 1305.4 Age of children and family income eligibility
- ▶ 1305.5 Recruitment of children
- ▶ 1305.6 Selection Process
- ▶ 1305.7 Enrollment and re-enrollment
- ▶ 1305.8 Attendance
- ▶ 1305.9 Policy on fees
- ▶ 1305.10 Compliance

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ELIGIBILITY

1305.4


9 **Age eligibility requirements**

Early Head Start	Head Start
<p>A child must:</p> <ul style="list-style-type: none"> • be an infant or a toddler younger than 3 years old. <p>A pregnant woman may be any age.</p>	<p>A child must:</p> <ul style="list-style-type: none"> • be at least 3 years old; or, • turn 3 by the date used to determine eligibility in the public school system; and, • not be older than compulsory school age.

10 **Income**

- ▀ Low-income
- ▀ Near Low-Income
- ▀ Over-Income

11 **Income Documentation**



- Income Documentation
- Individual Income Tax Form 1040
- W-2 forms
- Pay stubs
- Pay envelopes
- Written statements from employers
- Documentation showing current status as recipients of public assistance

12 **What is a year?**

- ▀ Head Start Act p.84 645(a)(1)(C)
- ▀ Policy Clarification I-008

No Income

OHS – PC – I – 006 How is income eligibility determined if a family claims it has no income?

Discuss with the family its specific situation and better understand what is happening in this family, including what sources of support the family has.

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Determine first if they accept the family's assertion it has no income and secondly consider what support the family has in meeting its on-going needs; i.e. food, housing, etc.

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Determining Family Size

Family means all persons living in the same household who are:

- (1) Supported by the income of the parents or guardians of the child enrolling or participating in the program, and
- (2) Related to the parents or guardians by blood, marriage or adoption.

Income Eligibility for Enrollment

Verify family income before determining a child is eligible to participate in the program (ACF-PI-HS-10-02)

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Two Actions:

1. Examine, calculate and determine
2. Sign a statement

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OMB 0970-0374, Expires 02/28/2016

Head Start: Eligibility Verification

1. Child's name: _____

2. Child's date of birth: _____

3. This child is eligible to participate in the program. Yes No

4. Check the applicable category of eligibility for this child:

<input type="checkbox"/> SSI	<input type="checkbox"/> Income (check box that applies)
<input type="checkbox"/> Supplemental Security Income	<input type="checkbox"/> Below Federal poverty guidelines
<input type="checkbox"/> Foster Care	<input type="checkbox"/> Between 100-125% of Federal poverty guidelines (no more than 35% of enrolled children may fall into this category)
<input type="checkbox"/> Public assistance	<input type="checkbox"/> Over Income
	<input type="checkbox"/> Exceeded as part of 100% maximum for non-AJ/NW program
	<input type="checkbox"/> Counted as part of the 40% maximum for AJ/NW program

5. What documentation was used to determine eligibility?

<input type="checkbox"/> Income Tax Form 1040	<input type="checkbox"/> Written statements from employers
<input type="checkbox"/> SSN	<input type="checkbox"/> Foster care reimbursement
<input type="checkbox"/> TANF documentation	<input type="checkbox"/> SSI documentation
<input type="checkbox"/> Pay stub or pay envelopes	<input type="checkbox"/> Other
<input type="checkbox"/> Unemployment	<input type="checkbox"/> If Other, please explain: _____

Documentation of no income: _____

6. Staff signature: _____ Date of eligibility verification: _____

7. Staff name: _____ Title: _____

THE FEDERAL REGISTER ACT OF 1935 (54 U.S.C. 101) Public reporting burden for this collection of information is estimated to average 10 minutes per response, including the time for reviewing existing records, gathering and reviewing the data needed for collecting the information, reviewing the collection of information, and preparing the response. Send comments regarding this burden estimate or any aspect of this collection of information, including suggestions for reducing the burden, to Washington Headquarters Service, U.S. Government Printing Office, Washington, DC 20543-0001.

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Categorically Eligible

Category rather than **Income** makes a family eligible for Head Start

- Recipient of Public Assistance
 - Supplemental Security Income
 - Temporary Assistance Needy Families
- Homeless Child
- Foster Child - 45 CFR 1305.2(1)

Do not check income for categorical eligibility

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Public Assistance

- **Documentation** showing **current status** as recipients of public assistance. (No income verification)
- **Only 2 programs** qualify as public assistance for eligibility purposes.

✓ **Temporary Assistance to Needy Families (TANF)**

✓ **Supplemental Security Income (SSI)**

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Homeless Children

- Must remove barriers to homeless children enrollment and participation in Head Start.
- Required to allow homeless children to apply to, enroll in and attend HS programs **while required documents are obtained** within a reasonable timeframe.

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Determining Homeless Eligibility

- Get the facts
- Analyze the facts
- Get additional input
- Sample questions
- Have the parent or guardian sign a statement certifying homelessness and retain as eligibility documentation.

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McKinney-Vento Homeless Assistance Act

The Act contains a **definition of homelessness that is now matched in the Head Start Act**

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McKinney-Vento Act Definition

Individuals who **"lack a fixed, regular and adequate nighttime residence"**

Specific Situations:


- Emergency and transitional shelters
- Sharing the housing of others due to loss of housing, economic hardship, or similar reasons
- Living in motels or hotels due to lack of adequate alternative accommodations.

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Keep in Mind



- Not all families sharing the housing of others will be considered homeless.
 - Families who are voluntarily staying with others in **permanent adequate** arrangements **will not meet** this definition.
 - Determinations of homelessness should be made on a case-by-case, individualized basis.



The Final Rule

The Head Start Eligibility Final Rule was published in the Federal Register on February 10, 2015.

The Final Rule became effective on March 10, 2015.

The new provisions are in FY2016 Monitoring Protocol, which means it will be used effective October 1, 2015.

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New Eligibility Requirements

NEW!

- Background
- Required Documentation
 - Third Party Verification
- New Definition of Family
- More Detailed Definition of Foster Care
- New Rule for Homeless Families
- Required Policy on Violations
- Training Requirements

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Background

- 2010 General Accounting Office investigation
- GAO attempted to enroll fictitious children as part of 15 undercover scenarios at centers in six states and the District of Columbia.
- In 8 instances, staff at these centers fraudulently misrepresented information, including disregarding part of a family's income to register over-income children into under-income slots.
- 7 Head Start employees lied about applicants' employment status or misrepresented their earnings.


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Video

NEW!

What Does the Rule Do?


The Final Rule:



Provides a roadmap for programs on how to determine eligibility; Describes documents program may accept to prove eligibility; **and**, Requires programs to retain records and to train staff.

NEW!

Required Documentation



- ▶ A program must keep eligibility determination records for each participant and on-going training records for program staffs. A program may keep these records electronically.

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NEW!

Each eligibility determination record must include:

- ▶ A statement that program staff has made reasonable efforts to verify information by:
- ▶ Conducting either an in-person, or a telephone interview with the family
- ▶ Describe efforts made to verify eligibility including age, income. And categorical eligibility
- ▶ In cases where the family reports no income, documentation of efforts to obtain third party verification.

NEW!

Required Documentation

- ▶ If a family does not have proof of income, the program may accept a family' member's written declaration that states the family does not have income or cannot prove income.
- ▶ In this and in all other instances, program staff is required to make reasonable efforts to verify the family's eligibility.

NEW!

Third Party Verification

Required documentation includes:

- ▶ The family's written consent to contact each third party
- ▶ The third parties' names, titles and affiliations,
- ▶ Information from third parties regarding the family's eligibility
- ▶ Program staff must adhere to program safety and privacy policies and procedures

NEW!

Third Party Verification

- Treat families in challenging situations with dignity and respect.
- Do not place families at risk or harm in order to verify information.
- Harm may include domestic violence, loss of housing, loss of other benefits, or risk of stigma or discrimination.
- Work with families and obtain consent

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NEW!

Required Documentation of Categorical Eligibility

- Describe specific circumstances of eligibility. How is the family homeless, where are they spending the night, etc.
- Describe efforts to verify eligibility, including third parties contacted.

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Definition of Family

- Family means all persons living in the same household who are:
- Supported by the child's parent(s) or guardian (s)' income; and
- Related to the child's parent(s) or guardian(s) by blood, marriage, or adoption; or
- The child's authorized caregiver or legally responsible party.
- Family, for a pregnant woman, means all persons who financially support the pregnant woman.

NEW!

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More Detailed Definition of Foster Care

- Foster care means 24- hour substitute care for children placed away from their parents or guardians and for whom the state agency has placement and care responsibility
- 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 made prior to the finalization of an adoption, or whether there is Federal matching of any payments that are made.

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New Rule for Homeless Families

- ▶ If a program determines a child is categorically eligible due to homeless status, it must allow that child to attend a Head Start program, without immunization and other medical records, proof of residency, birth certificate, or other documents. The program must give the family reasonable time to present these documents.
- ▶ This means that nothing in the new regulations should be used to make it more difficult for homeless families to enroll on the program.
- ▶ Staff should work with homeless families to acquire documentation, and give families reasonable time after services begin to assemble documentation.

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New Provisions



Except for the following provisions listed, this rule reiterates current requirements in the Head Start Performance Standards or in the Head Start Act.

- New Provisions in the Final Rule on HS Eligibility:**
- 1) Option for telephone interview
 - 2) Eligibility determination records
 - 3) Allowance for serving homeless children
 - 4) Written declarations

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New Provisions (continued)



Other new provisions:

- 5) Third party verification
- 6) Program policies and procedures (including actions for violating regulations)
- 7) Training for Staff and Governing Bodies



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Overview



INTERVIEW REQUIREMENT

41 Process Overview


NEW!



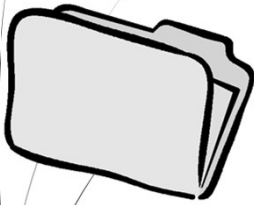
INTERVIEW OPTION

42 Overview

VERIFY INFORMATION



43 Process



NEW!

ELIGIBILITY DETERMINATION RECORDS

Staff must create an eligibility determination record for each participant

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NEW!


What must an eligibility determination record include?

- Copies of documents used to verify eligibility
- Statement that program staff has made reasonable efforts to verify information
- Statement that identifies eligibility determination e.g. Income or categorical eligibility

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01/16 XXX, Expires: XXX

Head Start Eligibility Verification



1. Child's name: _____

2. Child's date of birth: _____

3. This child is eligible to participate in the program. Yes No

4. Check the applicable category of eligibility for this child:

<input type="checkbox"/> SSI	<input type="checkbox"/> Income (check box that applies):
<input type="checkbox"/> Homeless	<input type="checkbox"/> Below federal poverty guidelines
<input type="checkbox"/> Foster Care	<input type="checkbox"/> Between 100-130% of federal poverty guidelines <i>(no more than 35% of enrolled children may fall into this category.)</i>
<input type="checkbox"/> Public assistance	<input type="checkbox"/> Over Income
	<input type="checkbox"/> Counted as part of 10% maximum for non-AI/AN programs)
	<input type="checkbox"/> Counted as part of the 49% maximum for AI/AN programs)

4. What documentation was used to determine eligibility?

<input type="checkbox"/> Income Tax Form 1040	<input type="checkbox"/> Written statements from employers
<input type="checkbox"/> W-2	<input type="checkbox"/> Foster care reimbursement
<input type="checkbox"/> TANF documentation	<input type="checkbox"/> SSI documentation
<input type="checkbox"/> Pay stub or pay envelopes	<input type="checkbox"/> Other _____
<input type="checkbox"/> Unemployment	If Other, please explain: _____

Documentation of no income: _____

5. Staff signature: _____ Date of eligibility verification: _____

6. Staff name: _____ Title: _____

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SUMMARY

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CERTIFICATE OF COMPLETION