



ADMINISTRATION FOR  
**CHILDREN & FAMILIES**

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Dear Head Start Grantees and Delegate Agencies,

I hope the holiday season was filled with joyful times with your loved ones and some respite to refuel.

As the New Year begins I want to bring attention to two requirements that have, in some cases, resulted in unnecessary and potentially detrimental actions taken by the grantee. First is the reporting requirement found in CFR 1302.102 (d)(1)(ii) requiring grantees to report immediately or as soon as practicable any significant incidents affecting the health and safety of program participants. Second is Standards of Conduct, CFR 1302.90 (c)(1)(i)(ii)(A)-(I),(iii),(iv),(iv) and (v), describing the positive strategies adults must implement when interacting with children, a list of prohibited actions endangering the health and safety of children, and ensuring no child is left alone or unsupervised.

Over the past year, reports of child health and safety incidents have increased. We are uncertain if the increased reporting is due to compliance with CFR 1302.102 (d)(1)(ii), whether more incidents are occurring, or both. We suspect it is due to the increased reporting, and we want to acknowledge grantees' compliance with the requirements. However, the Office of Head Start (OHS) has observed unintended consequences of these requirements that we want to bring to your attention. In some cases, grantees are reporting minor incidents that do not require self-report. More importantly, some agencies immediately terminate staff involved in incidents, which may not be, in all cases, the best course of action for the child and staff.

### **Reporting**

OHS has zero tolerance for any situation that places a child in harm's way. Grantees' hyper-vigilance in keeping every child safe and secure and feeling loved every moment while in their care is foundational to Head Start and Early Head Start programs. However; some grantees may believe they are required to report all health and safety incidents, even when they are not significant incidents and do not harm or endanger children. Grantee characteristics like climate, locale – urban, rural, remote, shared facilities including playgrounds, level of security systems, just to name a few – vary greatly, and it would be impossible for the Office of Head Start to issue a definitive list of what are considered non-reportable insignificant incidents. To determine which incidents are reportable, grantees should work with management, governing bodies, Health Advisory Committees, mental health consultants, and local or state licensing agencies to develop guidelines that differentiate between staff, consultant or volunteer practices, and/or behaviors that need improvement but do not harm or endanger children, versus reportable practices or behaviors that harm or endanger children.

## Personnel Actions

Personnel policies and procedures must include appropriate penalties for staff, consultants and volunteers who violate the Standards of Conduct. Many grantees move to immediate termination of staff involved in these violations. We are concerned grantees believe OHS expects termination of staff who violate the Standards of Conduct and will view it as correcting the violation. This perception is not correct. OHS expects that each incident will be carefully assessed and appropriate actions will be taken holistically, not just with the individual involved in the incident. Grantees should determine whether they have adequate ongoing support, supervision, and training necessary for staff to succeed. If necessary supports are not ongoing, systemic, and available to staff, consultants, and volunteers working directly with children, the problem is more likely a systemic management weakness, and firing an individual will not correct the problem long term.

Investing additional supports for staff committed to professional development and improvement may be, in some cases, a far better investment than termination. Children and parents may abruptly lose a beloved teacher, which can be disruptive to social and emotional development and erode continuity of care. Additionally, programs then face a period of time when staff are anxious, less experienced substitutes step in, and the likelihood of another incident increases.

We recognize growing and maintaining highly competent staff is a tough job, and not every day will be a perfect day; however, every day a child leaves their Head Start or Early Head Start program they should feel safe, valued, special, happy and bathed in love.

Sincerely,



Ann Linehan  
Acting Director  
Office of Head Start