



City of Chicago
Richard M. Daley, Mayor

Chicago Department of Family
and Support Services

Mary Ellen Caron, Ph.D.
Commissioner

Executive Office
2nd Floor
1615 West Chicago Avenue
Chicago, Illinois 60622
(312) 743-0300
(312) 743-0400 (FAX)
(312) 746-3455 (TTY)
www.cityofchicago.org

MEMORANDUM

TO: EXECUTIVE DIRECTORS/PROGRAM DIRECTORS/LEAD COPA USERS
FROM: LOUKISHA SMART PENNIX *LS*
DIRECTOR
CHILDREN SERVICES DIVISION
SUBJECT: ERSEA POLICIES PERTAINING TO FEDERAL REVIEW FINDINGS
DATE: 2/2/2009
CC: DELEGATE AGENCY GOVERNING BOARD

As you are aware, in 2008 the City of Chicago Head Start Grantee Department of Children and Youth Services (now the Department of Family Support Services) went through a Head Start Triennial Federal Review.

In order to assist our Delegate Agencies and Partners in making sure they have the systems in place to effectively monitor these areas, we are issuing the following guidance.

Documentation of age and income eligibility using the Checklist

HS Performance Standards state:

1305.4 Age of children and family income eligibility

(c) A signed statement by an employee of the Head Start program, identifying which of these documents was examined and stating that the child is eligible to participate in the program, must be maintained to indicate that income verification has been made.

Head Start Programs under the Office of Children and Youth Services have met this requirement using the Head Start Eligibility Verification (HSEV) form. The HSEV is produced and signed for every Head Start and Early Head Start child in Chicago at the time of enrollment, and kept in each child's eligibility folder.

In order to be in compliance with 1305.4, **Delegate Agency staff must complete the Documents Verified Checklist (accessed by clicking the "Checklist" link from the Child Data Sheet in COPA) before enrolling the child from the waiting list.** Completing the Checklist will populate Section 5 of the HSEV. **Section 5 of the HSEV must list the documents reviewed (i.e. Check Stub, Birth Certificate, etc) to determine eligibility in order for that HSEV to be valid.**

Please review the HSEV forms your agency has on file to ensure that Section 5 has been completed. **In cases where Section 5 has not been populated, please complete the Checklist in COPA for those children, and print a new, valid HSEV to be included in the child's file.**

Once completed, an HSEV is valid until that child transitions out of HS or EHS. Head Start eligibility is not subject to re-determination while the child remains in the program. Re-determination is for the Child Care portion of full day programming **only**. Children moving from EHS to HS require a new HSEV to be completed at the time of enrollment in the new program.

Proper enrollment of "Early 3" children in Head Start

Head Start Performance Standards [1305.4(a)] do not permit programs to enroll children in Head Start before the age of 3. Delegate Agencies and Partners are permitted to enroll children who turn 3 years of age during the program year, as long as that child's enrollment in Head Start occurs after the child's birthday. These children, commonly referred to as "Early 3s," must be enrolled using the correct protocol in order to avoid the appearance that children may have been enrolled before their third birthday.

In order to enroll a child in Head Start who was previously enrolled in another program model (such as Early Head Start or Child Care IP), **that child must first be terminated in COPA and then placed back on the waiting list**, where the child's Head Start eligibility can be determined.

- Please **do not use the COPA "Transfer" function** to move a child from one program model to another.
- Please also **do not simply go into the child's file and change the program model**.
- Using one of these incorrect methods to move a child into Head Start is not appropriate practice because changing a child's file in this way does not determine eligibility for Head Start and does not record an appropriate enrollment date for the child's entry into head start. **Moving a child from a two-year-old model to Head Start using improper procedure can create a record which indicates that a child was enrolled in Head Start before his or her 2nd birthday.**
- Once on the waiting list, please make sure that all income, age, and other eligibility information is correct, and complete the Checklist, before accepting the child into Head Start. **Please note that changes to the child's program model MUST be made on the Waiting List, and not on the Terminated List or while the child is enrolled.**

Class size and predominant age of children

In responding to the findings of the Federal Review, we will also need to address issues that were identified in the area of class size and composition. Head Start Performance Standards State:

1306.32 Center-based program option

(a) Class size

(2) Grantees must determine their class size based on the predominant age of the children who will participate in the class and whether or not a center-based double session variation is being implemented.

What this means for our programs is that in order to stay in compliance with Head Start standards, then number of children in each classroom must not exceed a number based on the predominant age of children in the class at the beginning of the enrollment year:

- **Full Day Classes** which are predominantly made up of 4 year olds can enroll up to **20 children**, while classes that are predominantly three can enroll no more than **17 children**.
- **Double Session (half day)** Classes which are predominantly made up of 4 year olds can enroll up to **17 children**, while classes that are predominantly three can enroll no more than **15 children**.
- **The predominant age of the children in every class must be determined at the start of a Head Start's program year (at the time enrollment is certified at the end of September) and that determination need not be changed** during the program year, irrespective of any changes in the age composition of the children in the class.
- Furthermore, the class size that you begin the year with is the class size programs are expected to maintain throughout their program year. The program can fill the vacancy with any age eligible child and the program's selection criteria should be the determining factor in deciding which child on the waiting list will be offered admission into the program.
- These class size restrictions apply to all classrooms with at least one Head Start child enrolled, and include all children in the classroom.

Children who have been enrolled in Head Start should be allowed to remain in the program until they age out. But going forward we are requiring that all Delegate Agencies and Partners put in place an effective system to make sure all Head Start classes are in compliance with this standard when we certify enrollment at the start of the program year.

We strongly suggest that staff who are responsible for assigning children to a classroom at sites with more than one Head Start classroom **strategically assign children to classrooms** upon enrollment to ensure that as many classrooms as possible have the predominant age of 4 in order to maximize the agency's funded enrollment while remaining in compliance with the standard.

- **4 year old children should be assigned to a given classroom only until more than half of the children in the class were 4 on the public school eligibility date (September 1).** The minimum class size for a class serving predominantly four year old children must be 17.

- Once the first classroom can be certified as predominantly 4 (more than half of the children were 4 on the public school eligibility date), the next four year old should be enrolled in a different classroom, and so on. The agency should be aiming for the greatest possible number of predominantly 4 year old rooms, and the smallest possible number of predominantly 3 year old rooms in order to maximize allowable enrollment.
- Similarly, as the agency enrolls 3 year olds, the should take care not to enroll so many 3 year olds in one classroom that they constitute more than half of the students in that room. **Agencies should stop enrolling 3 year olds in a given room before they comprise more than half of the children in the classroom.**

If you have further questions about these issues please contact Craig Zemke at craig.zemke@cityofchicago.org, telephone (312)-743-1446, or Earline Alexander at earline.alexander@cityofchicago.org, telephone (312)-743-2023. A Webinar will be held on Tuesday, February 3rd, to address these issues. The participation of all Head Start Delegate and Partners is required.