MEMORANDUM

CITY OF OAKLAND

TO:	HONORABLE MAYOR & CITY COUNCIL	**FROM:**	Estelle Clemons Interim Director, Human Services Department
SUBJECT:	City Council Head Start Program and Measure AA Update	**DATE:**	February 9, 2023

City Administrator Approval _(signature)_   Date: Mar 14, 2023

INFORMATION

This informational memorandum presents an update on the City of Oakland Head Start program requested by the City Council at the November 28, 2022 Life Enrichment Committee during the Measure AA report discussion. Specifically, the memorandum presents an update on Council Resolution No. 88801 C.M.S., Resolution No. 88940 C.M.S., and the intended plan for Head Start in relation to Measure AA funding.

Head Start Grant Award FY 2021 - 2026

In July 2021, the City of Oakland, in a competitive application process, was awarded a new Head Start grant for a five-year grant cycle starting July 1, 2021 through June 30, 2026. The award allocated $12,252,694 to provide 622 children and families with comprehensive early childhood services. This grant award was $4,926,986 less than the previous five-year grant award of $17,179,680 which served 1,038 slots. The Unity Council was awarded an independent Head Start grant to also serve Oakland in the competitive application process.

Council Resolution No. 88801 C.M.S

Through Council Resolution No. 88801 C.M.S. in September 2021, one time City funding was provided to expand the Head Start sites identified in the Office of Head Start Grant to ensure comprehensive early childhood service provision at the Franklin and Tassafaronga Head Start sites and the Arroyo Viejo Early Head Start site which included 14 FTE staff. This one-time funding expires on June 30, 2023.

The City of Oakland Head Start intends to continue serving these sites through two funding streams, State contract awards and Measure AA funds, if approved.

Council Resolution No. 88940 C.M.S

The December 7, 2021 Council Resolution No. 88940 C.M.S required the City Administrator to amend the budget that if existing Head Start/Early Head Start programs are restructured it will be done in a manner to retain all existing program staff, that no Head Start/Early Head Start programming be reduced and that no Head Start/ Early Head Start staff layoffs occur through the end of the current fiscal year 2021-2022, and fully fund all City of Oakland's Head Start/Early Head Start Programs and staff through June 30, 2022. This resolution provided City funding for 19.5 FTE staff.

The current budget extended this funding through to June 30, 2023 and is being revisited in the current two-year budget planning process. Human Services Department HSD intends to apply for 6.5 FTE to be submitted for funding in the Measure AA application. An additional 4 FTE can be funded by California General Child Care Program (CCTR) and The California State Preschool Program (CSPP) reimbursement contracts. The remaining 8 FTE staff would still need to continue to be funded by the City. An update on this resolution will be presented with the upcoming program report to Council.

State Contracts

The City of Oakland is the recipient of the California Depart of Education CSPP (California State Preschool Program) and has received an increased contract amount for the coming year, listed below. The program also received the recently awarded California Department of Social Services CCTR (California General Child Care Program) contract. These reimbursement contracts help fund approximately 10% to 15% of the costs for these 3 sites.

Funding Source	Contract Name	Maximum Reimbursable Amount	Program Served
California Department of Education	California School Preschool Program (CSPP)	$3,364,765	Head Start Sites
California Department of Social Services	General Child Care Program (CCTR)	$3,315,326	Early Head Start Sites

Measure AA

The Oakland Children's Initiative (Measure AA) is a 2018 Charter Amendment passed by the citizens of Oakland to deepen the early investment in children and support them through college graduation, by expanding access to high quality preschool and providing college access, mentorship, and scholarship support services for students to obtain 4-year or 2-year college or technical degrees.

The Oakland Charter establishes three funds: 1) the Oakland Early Education Fund, funded by 62% of the proceeds of the parcel tax, 2) the Oakland Promise Fund, funded by 31% of the

proceeds of the parcel tax and 3) the Oversight, Accountability, and Evaluation Fund, funded by 7% of the proceeds of the parcel tax.

Section 1606.(b)(2) specifically calls out City of Oakland Head Start as a funding priority. Measure AA requires expanding existing public services and states: "First funding priority shall be given to public agencies to expand public programs in all areas of the City that meet a baseline quality level and can accommodate more children using empty classrooms and/or filling vacancies, particularly programs at Oakland Unified School District (OUSD) and City of Oakland Head Start. This could include converting part-day OUSD preschool to full-day OUSD preschool at OUSD sites, hiring additional OUSD staff, or expanding the hours of service to better meet the needs of working families, subject to capacity limitations determined by OUSD and City of Oakland Head Start in consultation with the Implementation Partner.

After OUSD and Head Start sites have reached agreement with the Implementation Partner on ensuring funding to reach capacity as outlined above, the Early Education Fund may contract with private nonprofit agencies that show a commitment to and interest in serving low income children and adhere to the privatization requirements set forth in paragraphs (3) and (4) of this subdivision."

Council Resolution No. 89517, approved on December 06, 2022, authorized First 5 Alameda County as the Early Education Implementation Partner for a five-year term in the amount of twenty-three million, one hundred eighty-one thousand four hundred and twenty-eight dollars ($23,181,428) to implement the Early Education program.

City of Oakland Head Start is currently developing a strategic plan for the expansion of services and quality improvements that meet the terms of Measure AA and will submit these to the Implementation Partner (First 5 Alameda County) per the application guidance. The program anticipates receipt of guidance following the finalization of the Implementation Partner contract, when directives will be provided to the City of Oakland Head Start regarding funding opportunities. The timeline for this is projected to be between April and June 2023.

The program intends to submit an application that includes funding to the three expanded sites of Franklin, Tassafaronga and Arroyo Viejo, in addition to further expansion and quality improvement objectives such as smaller teacher to child ratios, behavioral aides and specialists, expanded hours of care, increased days of service to full-year and staff wellness.

Lincoln Square Recreation Center

City Council requested information regarding the Council Resolution No. 88801 C.M.S., September 2021 directive to "include relevant enhancements to the Lincoln Square Recreation Center Renovation Capital Improvement Fund" in order to add Head Start services to the Center. The status of this remains unchanged from the information provided during the discussion with City Council at the FY22-23 Head Start Continuation Application report presentation, which is that the timeline of the Capital Improvement Fund did not allow for an addition of a Head Start Center at the Lincoln Square Recreation Center. Following, the November 28, 2022 City Council meeting, Head Start contacted the Capital Improvement team who confirmed that this was still

the case and there was not an opportunity to add Head Start to the site. Currently, the Laney Child Development Center and the Broadway Early Head Start are the two closest locations.

City of Oakland Head Start is working to identify potential partners, family childcare providers and new facility opportunities in the area to ensure that services are provided for the Oakland communities that would have been served by a site at the Lincoln Square Recreation Center. The program has met with the East Bay Asian Local Development Corporation (EBALDC) to secure a 0 to 5 Head Start site at the Lake Merritt BART project, however, this prospective site would not become available until 2026-2028.

The Oakland Head Start program intends to include upgraded facilities as a key quality improvement and requirement for expansion of Head Start services in its Measure AA funding application. The program has noted that the following tasks are needed to meet this objective including identifying partners in quality facilities, identifying new existing facilities for expansion of services, and the building of new model facilities to meet the needs and the quality improvement required. A Head Start facilities assessment and strategic plan is a program priority and Measure AA funding will help to advance the objective to improve the quality of its sites, and in turn, services to Oakland families.
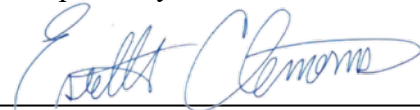
Additional Updates

The Oakland Head Start program underwent a federal review on February 6 through February 8. This review covered Focus Area 1 (**Attachment A**) which is the initial review in the five-year grant cycle and consists of interviews with program staff to discuss each service area: program design and management structure, fiscal operations, family and community engagement services, education & child Development, health/health & safety practices, and ERSEA (Eligibility, Recruitment, Selection, Enrollment and Attendance).

The program will bring to the Council reports on the status of California State contract applications and the Office of Head Start continuation application due in April. The City of Oakland Head Start program will also present a detailed annual update in May of 2023.

For questions, please contact Estelle Clemons, Interim Director, 510-238-6794 or Diveena Cooppan, Head Start Manager, 510-238-3165.

Respectfully submitted,

ESTELLE CLEMONS
Interim Director, Human Services Department

Attachments (1):
Attachment A - Focus Area 1 Monitoring Protocol FY 23

Fiscal Year (FY) 2023 Focus Area 1 Monitoring Protocol

Purpose

Focus Area 1 (FA1) is an opportunity for grant recipients to discuss their program design, management, and governance structure. Grant recipients will describe the program's approaches to staffing structure, program design, education, health services, family services, fiscal infrastructure, and program governance.

Approach

The FA1 review is an off-site discussion. The review begins with the Review Lead conducting a document review using data and reports from the Head Start Enterprise System (HSES) and other sources to learn about the grant recipient's program design and understand the needs of the children and families the program serves. Before the call with the grant recipient, the Review Lead will speak with the grant recipient's regional program specialists for additional context about the program.

Following the document review, the Review Lead will conduct a series of off-site virtual interviews with the grant recipient over the course of three consecutive days. These discussions will provide an understanding of the program's design and plans for implementing and ensuring comprehensive, high-quality services that meet the needs of children and families.

Methodology

Document Review. The Review Lead will focus on the following listed documents located in the HSES or other available sources:

- Grant Application/Goals, including the budget
- Program Information Report (PIR) data
- Community Assessment Summary
- Past Monitoring Data
- Self-Assessment Data
- Annual Report
- Audits

Virtual Discussions. The Review Lead will work with the grant recipient to identify the appropriate individuals to participate in the off-site discussions (e.g., the governing body, the policy council, managers, and direct service staff).

Road Map to the FY 2023 Focus Area One Monitoring Protocol

This protocol will guide the discussions between the grant recipient and the reviewer during the FA1 review. It includes the topic areas for discussion, specific performance areas for assessment, and the federal regulations associated with each area of performance. The protocol is divided into the following five topic areas:

- Program design, management, and quality improvement
- Designing quality education and child development program services
- Designing quality health program services
- Designing quality family and community engagement program services
- Developing effective Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) strategies and fiscal infrastructure

Federal Regulations

Each section of the protocol includes a list of the federal regulations grounding the discussions. This list ensures transparency regarding the regulations used when assessing program performance. Grant recipients should note that they remain accountable for all the Head Start Program Performance Standards (HSPPS) and other federal, state, and local regulations guiding program operations, management, and oversight.

What We Want to Learn

This section of the protocol outlines the topics for discussions between the Review Lead and grant recipient. We designed the statements and questions listed in this section to stimulate a meaningful discussion that provides grant recipients with an opportunity to describe the intentionality behind their program design, decisions, and operations; their challenges and strengths; and their strategies for continuous program improvement.

Questions and statements in the *What We Want to Learn* section are not intended to be exhaustive or to limit discussion. Using these sections as a guide, the Review Lead and grant recipient may engage in discussion beyond the questions included in the protocol.

Program Design and Management

Overview

Purpose

Each grant recipient must design a program that meets the community's needs and ensures a program, fiscal, and human resources structure that provides effective management and oversight of all program areas. This section focuses on the intentionality of the grant recipient's program design and its ability to address the characteristics, strengths, and needs of children and families they serve. The purpose of this section is to gain a foundational knowledge of the grant recipient's program design and structure.

Approach

The grant recipient will have the opportunity to share what it has learned about the needs of children and families in its community and how the program design is responsive to those needs and promotes school readiness. The governing body, policy council, and Management Team should be prepared to share lessons learned from the program's internal and external data and how the information ensures quality program services. This section contains three areas for discussion: *the program's understanding of the needs within the community; the program's approach to providing effective management and oversight;* and *how the policy council and the governing body fulfill their roles and responsibilities.*

Program Outcomes

Grant recipients use data from the Community Assessment to inform the grant application based on the needs of the community. However, the community changes over time. OHS is interested in understanding the type of data the grant recipient collects to understand these changing needs (e.g., natural shifts in the community, natural disasters, public health crises) and how the management system provides effective oversight—both program data and external information—to oversee the provision of quality services for children and families and to ensure progress toward school readiness.

Federal Regulations

1301.2(a-b) Governing body

1301.3(b-c) Policy council and policy committee

1302.11(b) Determining community strengths, needs, and resources

1302.20(a) Determining program structure

1302.101(a-b) Management system

1302.102(a-d) Establishing program goals

1302.102(c) Using data for continuous improvement

What We Want to Learn

Program Design

Performance Measure 1 (PM1): The grant recipient's program structure and design is informed by the community's strengths and needs.

1. The grant recipient will describe how the program took into account various characteristics, such as ethnicity, language, disabilities, mental health, children in foster care, homelessness, and working families, when designing the program. 1302.11(b)(1)
2. The recipient will discuss their agency's strategies for addressing inequities and promoting diversity, belonging, and inclusion among staff, families, and children.
3. The grant recipient will describe how the program selected program option(s) and program location to meet the needs of children and families, including any recent community changes. 1302.20(a)(1)

Management and Quality Improvement

PM2: The grant recipient has an approach to providing effective management and oversight of all program areas and fiduciary responsibilities.

1. The grant recipient will discuss how the program supervises all staff and ensures professional development opportunities. 1302.101(a)(2)
2. The grant recipient will describe the process for using child-specific and program-level data to monitor program improvement in all services areas, including education, family services, health, fiscal, ERSEA, and program management. 1302.102(c)(2)(ii)
3. The grant recipient will discuss how the program ensures sufficient staffing and staffing patterns support the provision of a full range of services. 1302.101(a)(3)

Program Governance

PM3: The grant recipient maintains a formal structure for program governance that includes a governing body, a policy council (or policy committee for delegates), and parent committees.

1. The grant recipient will describe the composition of the governing body and the policy council, and the grant recipient's strategy for how the members of these bodies support the program. 1301.2(a-b) and 1301.3(b-c)

Designing Quality Education and Child Development Program Services

Overview

Purpose

This section focuses on the program's approach to providing high-quality early education and child development services that promote the cognitive, social, and emotional growth of children, including those with disabilities, for later success in school.

Approach

The grant recipient will have the opportunity to describe its strategy for designing and implementing effective teaching practices and implementing safe, well-organized learning environments (and group socialization opportunities in home-based programs) that meet each child's needs. This section contains four areas for discussion: *how the program aligns with school readiness; the program's strategies for ensuring effective teaching practices; how the program supports teachers in promoting school readiness; and how the home-based program option helps parents provide high-quality learning experiences.*

Program Outcomes

The grant recipient will describe the data used to assess progress toward meeting the program's school readiness goals and the data used to understand, track, and address children's individual needs. The grant recipient will also describe how the data are used to inform continuous improvement related to curriculum selection, instruction, and professional development.

Note: Receiving schools refers to schools and programs where enrolled children will attend upon completing the Head Start or Early Head Start program.

Federal Regulations

642(f)(3) Curriculum

1302.31(b) Effective teaching practices

1302.35(a) Education in home-based programs

1302.91(a) Staff qualifications and competency requirements

1302.102(a)(3) School readiness goals

What We Want to Learn

Alignment with School Readiness

PM1: The grant recipient's approach to school readiness aligns with the expectations of receiving schools, the Head Start Early Learning Outcomes Framework (HSELOF), and state early learning standards.

1. The grant recipient will describe how the program plans to align the program's school readiness goals with the expectations of receiving schools, the HSELOF, and the state early learning standards. 1302.102(a)(3)
2. The grant recipient will describe why the program chose its curriculum, how it is responsive to the needs of the children, and how the curriculum will help the program meet school readiness goals. 642(f)(3)

Effective and Intentional Approach to Teaching Practices

PM2: The grant recipient has strategies to ensure teaching practices promote progress toward school readiness.

1. The grant recipient will describe the program's strategies for ensuring teaching practices are responsive to and build on the developmental progressions of children. 1302.31(b)(1)(ii)

Supporting Teachers in Promoting School Readiness

PM3: The grant recipient has an approach for ensuring teachers are prepared to implement the curriculum and support children's progress toward school readiness.

1. The grant recipient will describe the qualifications required for education staff, and if staff currently meet those requirements. 1302.91(a)

Home-Based Program Services

PM4: The grant recipient has strategies to ensure home-based program services help parents to provide high-quality learning experiences.

1. The grant recipient will discuss strategies for promoting secure parent-child relationships and helping parents provide high-quality learning experiences. 1302.35(a)
2. The grant recipient will describe their process for tracking interactions with expectant families, including the services expectant mothers and their families may receive from community partners.

Designing Quality Health Program Services

Overview

Purpose

This section focuses on how the grant recipient provides high-quality health, oral health, mental health, and nutrition services that are developmentally, culturally, and linguistically appropriate and are supportive of each child's growth and school readiness. This section also focuses on the program's approach for maintaining a system of health and safety practices and how the program provides quality services for expectant families.

Approach

The grant recipient will describe the program's approach for ensuring the delivery of high-quality health, oral health, mental health, and nutrition services. The grant recipient will also describe how they ensure children's safety.

Program Outcomes

The grant recipient will share the type of data used to understand child health outcomes and describe how the data are used along with the expertise of the Health Services Advisory Committee (HSAC) to inform continuous improvement.

Federal Regulations

1302.40(b) Health Services Advisory Committee (HSAC)

1302.42(a-d) Child health status and care

1302.45(b)(1) Mental health consultants

1302.47(b)(1-4) Safety practices

648A(g)(3) Staff recruitment and selection procedures: criminal record checks

1302.90(c) Standards of Conduct

1302.102(d)(1)(ii) Reporting of child safety incidents

1302.17(a)(1-4) and (b)(1-3) Suspension and expulsion

What We Want to Learn

Child Health Status and Care

PM1: The grant recipient has an approach to ensuring delivery of high-quality health services.

1. The grant recipient will discuss the approach to ensuring children have continuous ongoing health care. 1302.42(a)

2. The grant recipient will discuss the approach to ensuring children are up-to-date on a schedule of age-appropriate preventive and primary medical and oral health care. 1302.42(b)(1)(i)
3. The grant recipient will discuss the approach to ensuring ongoing care and extended follow-up care. 1302.42(c-d)
4. The grant recipient will describe how the program leverages expertise of the HSAC, including Head Start parents, health professionals, and community members, to learn about and support each child's health and mental health needs. 1302.40(b)
5. The grant recipient will describe how the program secures a mental health consultant to implement strategies to support children, staff, and families to meet mental health and social-emotional needs, including support for children with mental health and social and emotional concerns. 1302.45(b)(1)
6. Does the program prohibit or severely limit the use of suspension due to a child's behavior? 1302.17(a)(1-4) and (b)(1-3)

Health and Safety Practices

PM2: The grant recipient has strategies for maintaining healthy and safe environments and for ensuring all staff have complete background checks.

1. The grant recipient will describe the program's approach to ensuring safe learning environments (e.g., indoor and outdoor facilities, equipment, materials are safe and free of environmental toxins). 1302.47(b)(1)(ix) and (b)(2)(v)
2. The grant recipient will describe their process for inspecting facilities to ensure there is not lead in paint or lead in water.
3. The grant recipient will describe the program's process for ensuring all staff have background checks, including the timeliness of the background checks. 648A(g)(3)
4. The grant recipient will describe the program's strategy for training staff on safety practices and procedures including suspected child abuse. 1302.47(b)(4)
5. The grant recipient will describe how they ensure all staff abide by the program's Standards of Conduct. 1302.90(c)
6. The grant recipient will describe any incidents of violations of supervision, unauthorized release, or inappropriate discipline that occurred in the last two years and whether those incidents were reported to their Regional Offices by the grant recipient. 1302.102(d)(1)(ii)

Designing Quality Family and Community Engagement Program Services

Overview

Purpose

The grant recipient must integrate parent and family engagement strategies into all systems and program services to support family well-being and promote children's learning and development. Programs are encouraged to develop innovative two-generation approaches that address prevalent needs of families across their program and leverage community partnerships or other funding sources.

Approach

The program will provide information about its strategy for integrating high-quality family engagement services into all areas of programming that are responsive to the needs of families. The grant recipient will have the opportunity to discuss the expected outcomes for families and how the program design supports achieving those outcomes. This section contains two areas for discussion: *the program's approach for collaborating with families* and *for providing services that strengthen parenting skills.*

Program Outcomes

The grant recipient will describe how the program determines the resources needed to support family well-being, either within the program or through community partnerships. This includes sharing how the program measures the impact of family support services.

Federal Regulations

1302.51(a-b) Parent activities to promote child learning and development

1302.52(c) Family partnership services

1302.53(a)(1) Community partnerships

What We Want to Learn

Family Well-Being

PM1: The grant recipient has an approach for collaborating with families to support family well-being.

1. The grant recipient will describe the approach to supporting family goal-setting and tracking family strengths, needs, and progress toward goals. 1302.52(c)(3)
2. The grant recipient will describe the strategies for obtaining resources that support family well-being, either within the program or through community partnerships. 1302.53(a)(1)

Strengthening Parenting and Parent-Child Supports

PM2: The grant recipient has an approach to providing services that strengthen parenting skills.

1. The grant recipient will describe how the program plans to support parents in strengthening parenting skills. 1302.51(a)

Developing Effective ERSEA Strategies and Fiscal Infrastructure

Overview

Purpose

In this section, the grant recipient will describe how the program's recruitment and selection strategies are responsive to the needs of the community's eligible children and families, and the strategy for maintaining their funded enrollment level. The grant recipient will also provide information about the program's fiscal capacity and financial infrastructure.

Approach

The grant recipient will describe the program's strategy for recruiting and selecting eligible children and families, the process for maintaining enrollment, and for ensuring children and families meet eligibility requirements. The grant recipient will describe how the program ensures its own internal monitoring against fraud, waste, and abuse. The fiscal representative will also discuss how the program supports the accomplishment of program goals and effectively oversees program funds and property through qualified fiscal personnel and a responsive budget. This section contains five areas for discussion: *strategies for enrolling children or expectant families who are eligible for the program; strategies for enrolling children eligible for services under the Individuals with Disabilities Education Act (IDEA); how the program maintains and tracks enrollment; how the grant recipient's fiscal staff have the qualifications to provide oversight of the grant; and how the grant recipient's budget development and revision process includes stakeholders, appropriate approvals, and ensures continuous alignment with program design, goals, and objectives.*

Program Outcomes

The grant recipient will share information about ERSEA practices and how data are used to ensure the program maintains funded enrollment based on eligibility criteria. The grant recipient will describe what data are used and how to inform the development and refinement of the program's budget. The grant recipient will also share how the program uses data to determine the effectiveness of the program's fiscal infrastructure.

Federal Regulations

1302.12 Determining, verifying, and documenting eligibility

1302.14(a) - (c) Selection process and children eligible for services under the Individuals with Disabilities Education Act (IDEA)

1302.15(a) Funded enrollment

1302.91(a) and (c) Staff qualifications and competency requirements

1302.102(d)(i) Status reporting to governing body and policy council

75.308 Revision of budget and program plans

642(c)(1)(E)(iv)(VII)(aa-bb) Governing body responsibilities

642(c)(2)(D)(iii-iv) Policy council responsibilities

What We Want to Learn

Eligibility, Recruitment, Selection, Enrollment, and Attendance

PM1: The grant recipient enrolls children or expectant families who are categorically eligible or who meet defined income-eligibility requirements.

1. The grant recipient will describe how staff verify eligibility and how the program maintains eligibility records, including:
   o How copies of any documents or statements, including declarations, that are necessary to verify eligibility are collected and maintained. 1302.12(k)(2)(i)
   o How program staff make reasonable efforts to verify eligibility by conducting either an in-person, virtual, or telephone interview with the family. 1302.12(k)(2)(ii)
   o How program staff collect statements that identify whether the family or expectant family meets the following eligibility requirement: 1302.12(c)(1-2), (d)(1), and (e)(1)(iii)
      ▪ Income is equal to or below the poverty line
      ▪ Receiving or is eligible to receive public assistance (Supplemental Security Income and Temporary Assistance for Needy Families)
      ▪ Experiencing homelessness
      ▪ In foster care
      ▪ Included in the 10% of children enrolled in the program above the income threshold
      ▪ Included in the 35% of children who are not categorically eligible whose family income is between 100% and 130% of poverty

Note: For tribal programs, there are additional allowances provided under 1302.12(e).

2. The grant recipient will describe how the program ensures staff verifies and reviews all the documents available for determining eligibility. 1302.12(a)(ii)
3. The grant recipient will describe how the program ensures staff receive ERSEA training and comply with eligibility determination regulations, including having policies and procedures in place to describe actions taken against staff who violate these regulations. 1302.12(l-m)

PM2: At least 10% of the grant recipient's funded enrollment is filled by children eligible for services under Individuals with Disabilities Education Act (IDEA) or the grant recipient has received a waiver.

1. The grant recipient will disclose the percentage of children enrolled under IDEA, or that the grant recipient has received a waiver. 1302.14(b)(1)

Enrollment Verification

PM3: The grant recipient maintains and tracks full enrollment for all enrolled participants.

1. The grant recipient will describe the process for determining when a slot is vacant, process for removing from the enrollment numbers reported in the HSES children or expectant mothers who have not attended for 30 days, and filling slots that have been vacant for 30 days. 1302.15(a)
2. The grant recipient will describe the availability and use of a waitlist that ranks children according to the selection criteria. 1302.14(c)

Fiscal Infrastructure, Capacity, and Responsiveness

PM1: The grant recipient's fiscal staff have the qualifications needed to provide oversight of the grant.

1. The grant recipient will describe the fiscal complexity of the program and applicable financial management requirements, including the existence of multiple funding sources.
2. The grant recipient will describe the process for staffing fiscal responsibilities and how the staffing meets the financial management needs of the organization. 1302.91(a)
3. Does the fiscal officer have the required qualifications if hired after November 2016? 1302.91(c)
4. The grant recipient will describe how the staff develop and deliver usable financial information to the governing body and the policy council to inform their fiscal decision-making. 1302.102(d)(1)(i)

PM2: The grant recipient has a budget development and revision process that includes stakeholders and appropriate approvals, and ensures continuous alignment with program design, goals, and objectives.

1. The grant recipient will describe the budget development process, including:
   o Who is involved. 642(c)(1)(E)(iv)(VII)(aa-bb) [governing body] and 642(c)(2)(D)(iii-iv) [policy council]
   o How the budget aligns with the program's design and goals. 1302.101(a)(3)
   o The grant recipient's process for tracking the budget, making revisions, and obtaining required approvals in compliance with federal regulations. 75.308; 642(c)(1)(E)(iv)(VII)(aa)