

City of Phoenix

*Meeting Location:
City Council Chambers
200 W. Jefferson St.
Phoenix, Arizona 85003*



City of Phoenix

Agenda

Wednesday, December 11, 2024

10:00 AM

City Council Chambers

Economic Development and Housing Subcommittee

*Councilwoman Ann O'Brien, Chair
Councilwoman Kesha Hodge Washington
Councilman Kevin Robinson
Vice Mayor Debra Stark*

If viewing this packet electronically in PDF, open and use bookmarks to navigate easily from one item to another.

OPTIONS TO ACCESS THIS MEETING

Virtual Request to speak at a meeting:

- Register online by visiting the City Council Meetings page on phoenix.gov at least 2 hours prior to the start of this meeting. Then, click on this link at the time of the meeting and join the Webex to speak:

<https://phoenixcitycouncil.webex.com/phoenixcitycouncil/onstage/g.php?MTID=e3da0248f09393f17eedd18e7e1f2e17b>

- Register via telephone at 602-262-6001 at least 2 hours prior to the start of this meeting, noting the item number. Then, use the Call-in phone number and Meeting ID listed below at the time of the meeting to call-in and speak.

In-Person Requests to speak at a meeting:

- Register in person at a kiosk located at the City Council Chambers, 200 W. Jefferson St., Phoenix, Arizona, 85003. Arrive 1 hour prior to the start of this meeting. Depending on seating availability, residents will attend and speak from the Upper Chambers, Lower Chambers or City Hall location.

- Individuals should arrive early, 1 hour prior to the start of the meeting to submit an in-person request to speak before the item is called. After the item is called, requests to speak for that item will not be accepted.

At the time of the meeting:

- Watch the meeting live streamed on phoenix.gov or Phoenix Channel 11 on Cox Cable, or using the Webex link provided above.

- Call-in to listen to the meeting. Dial 602-666-0783 and Enter Meeting ID 2553 077 4181# (for English) or 2558 175 6041# (for Spanish). Press # again when prompted for attendee ID.

- Watch the meeting in-person from the Upper Chambers, Lower Chambers or City Hall depending on seating availability.

Para nuestros residentes de habla hispana:

- Para registrarse para hablar en español, llame al 602-262-6001 al menos 2 horas antes del inicio de esta reunión e indique el número del tema. El día de la reunión, llame al 602-666-0783 e ingrese el número de identificación de la reunión 2558 175 6041#. El intérprete le indicará cuando sea su turno de hablar.

- Para solamente escuchar la reunión en español, llame a este mismo número el día de la reunión 602-666-0783; ingrese el número de identificación de la reunión 2558 175 6041#. Se proporciona interpretación simultánea para nuestros residentes durante todas las reuniones.

- Para asistir a la reunión en persona, vaya a las Cámaras del Concejo Municipal de Phoenix ubicadas en 200 W. Jefferson Street, Phoenix, AZ 85003. Llegue 1 hora antes del comienzo de la reunión. Si desea hablar, regístrese electrónicamente en uno de los quioscos, antes de que comience el tema. Una vez que se comience a discutir el tema, no se aceptarán nuevas solicitudes para hablar. Dependiendo de cuantos asientos haya disponibles, usted podría ser sentado en la parte superior de las cámaras, en el piso de abajo de las cámaras, o en el edificio municipal.

CALL TO ORDER

CALL TO THE PUBLIC

MINUTES OF MEETINGS

1 Minutes of the Economic Development and Housing Subcommittee Meeting

Page 7

Attachments

[Attachment A - Nov. 25, 2024 Minutes.pdf](#)

CONSENT ACTION (ITEMS 2-3)

- 2 **Request Approval of the Head Start Birth to Five
2025-26 ERSEA Plan Updates - Districts 1, 3, 4, 5, 7 and
8** **Page 12**

Attachments

[Attachment A - COP ERSEA Plan 2025-2026.pdf](#)

- 3 **Approval of Head Start Birth to Five Standards of
Conduct Policy - Districts 1, 3, 4, 5, 7 and 8** **Page 33**

Attachments

[Attachment A - Standard of Conducts Revised.pdf](#)

INFORMATION ONLY (ITEMS 4-5)

- 4 **Head Start Birth to Five Program 2023-2024 School
Readiness Outcomes and Program Information Reports
- Districts 1, 3, 4, 5, 7 and 8** **Page 39**

Attachments

[Attachment A - Center-Based Infant Toddler Child Outcomes 2023-2024.pdf](#)

[Attachment B - Home-Based Infant Toddler Outcomes 2023-2024.pdf](#)

[Attachment C - Preschool Child Outcomes 2023-2024.pdf](#)

[Attachment D - EHS Center-Based Family Outcomes 2023-2024.pdf](#)

[Attachment E - Home Based Family Outcomes 2023-2024.pdf](#)

[Attachment F - Preschool Family Outcomes 2023-2024.pdf](#)

[Attachment G - PIR Outcomes 2023-2024.pdf](#)

Members:

Councilwoman Ann O'Brien, Chair
Councilwoman Kesha Hodge Washington
Councilman Kevin Robinson
Vice Mayor Debra Stark



Report

Agenda Date: 12/11/2024, Item No. 1

Minutes of the Economic Development and Housing Subcommittee Meeting

This item transmits the minutes of the Economic Development and Housing Subcommittee Meeting on November 25, 2024 for review, correction or approval by the Economic Development and Housing Subcommittee.

THIS ITEM IS FOR POSSIBLE ACTION.

The minutes are included for review as **Attachment A**.

Responsible Department

This item is submitted by Deputy City Manager John Chan and the City Manager's Office.

**Phoenix City Council
Economic Development and Housing (EDH) Subcommittee
Summary Minutes
Wednesday, November 25, 2024**

City Council Chambers
200 W. Jefferson Street
Phoenix, AZ

Subcommittee Members Present

Councilwoman Ann O'Brien, Chair
Vice Mayor Debra Stark (Phone)
Councilwoman Kesha Hodge Washington
Councilman Kevin Robinson

Subcommittee Members Absent

CALL TO ORDER

Chairwoman O'Brien called the Economic Development and Housing Subcommittee to order at 10:01 a.m. with Vice Mayor Stark, Councilwoman Hodge Washington and Councilman Robinson present.

CALL TO THE PUBLIC

None.

MINUTES OF MEETINGS

1. Minutes of the Economic Development and Housing Subcommittee Meeting

Councilwoman Hodge Washington made a motion to approve the minutes of the October 9, 2024, Economic Development and Housing Subcommittee meeting. Councilman Robinson seconded the motion which passed unanimously, 4-0.

CONSENT ACTION (ITEMS 2-4)

Items 2-4 were for consent action. No presentations were planned, but staff was available to answer questions.

2. Chapter 39 Text Amendment to Prohibit Unsound Fences in Right of Way

Consent only. No councilmember requested additional information.

3. Head Start Birth to Five Program to Purchase Capital Equipment Over \$5,000

Consent only. No councilmember requested additional information.

4. Head Start Birth to Five Program's Health and Safety Report

Consent only. No councilmember requested additional information.

Councilwoman Hodge Washington made a motion to approve Items 2 through 4. Councilman Robinson seconded the motion which passed unanimously, 4-0.

INFORMATION ONLY (ITEMS 5-6)

5. Head Start Birth to Five Monthly Report - September

Information only. No councilmember requested additional information.

6. HUD 2025-2029 Consolidated Plan, 2025-26 Annual Action Plan, Citizen Participation Plan, and Analysis of Impediments to Fair Housing Choice Study Consultant Services

Information only. No councilmember requested additional information.

INFORMATION AND DISCUSSION (ITEMS 7-8)

7. Phoenix Film Office 50th Anniversary

Community and Economic Development Director Christine Mackay, Film Office Program Manager Phil Bradstock and Management Fellow Destiny Dominguez presented on the item.

Councilwoman Hodge Washington congratulated the Film Office's 50th anniversary. She inquired if it is possible to distinguish the City of Phoenix and the greater Phoenix area in the economic impact figures.

Mr. Bradstock explained it is difficult to distinguish the City of Phoenix with other surrounding municipalities.

Chairwoman O'Brien asked if the numbers presented include cities such as Flagstaff and Tucson.

Mr. Bradstock answered they do not.

Chairwoman O'Brien requested a report in the future on the impacts of the State's film incentive.

Vice Mayor Stark congratulated the 50-year anniversary of the Film Office.

8. Halo Vista Update – New Mix-Use Development

Community and Economic Development Director Christine Mackay and Deputy Community and Economic Development Director Nathan Wright presented on the item. Staff would be returning to the next Economic Development and Housing Subcommittee meeting in December with recommendation for development agreement.

Councilwoman Hodge Washington congratulated all parties involved in the project and stated this project would not have happened without the partnership of this project.

Councilman Robinson congratulated staff for the hard work on the project.

Vice Mayor Stark congratulated everyone involved.

Chairwoman O'Brien thanked staff for their hard work and innovation.

DISCUSSION AND POSSIBLE ACTION (ITEM 9)

9. Resource Innovation Campus Agreements Authorization

Community and Economic Development Director Christine Mackay, Public Works Director Felipe Moreno, and Project Manager Amanda Jordan presented on the item.

Chairwoman O'Brien asked if the pilot phase uses hard goals to measure success.

Ms. Mackay said there will be goals in the development agreements and the metrics would increase as years go on.

Councilman Robinson inquired if there are any other projects through Reinvent Cities in the United States used as a benchmark.

Ms. Jordan explained this development is a first of its kind.

Councilman Robinson asked how success is measured in this project.

Mr. Moreno answered success is measured by diversion from the landfill and revenue generated.

Councilwoman Hodge Washington asked if there is data on what percentage of landfill consists of plastic waste and biosolids.

Ms. Jordan explained while it is difficult to determine makeup of recycled plastic that has already entered the landfill, there is data being captured and monitored regarding the amount of recycled plastics and biosolids being collected.

Councilwoman Hodge Washington inquired what is the anticipated impact the pilot phase.

Mr. Moreno answered the City is aiming for 50 percent recycling.

Ms. Mackay stated she will provide further information on landfill diversion to the Subcommittee.

Chairwoman O'Brien expressed excitement the City is leading in this area and finding innovative solutions for waste diversion.

Councilwoman Hodge Washington made a motion to approve the item. Councilman Robinson seconded the motion which passed unanimously, 4-0.

CALL TO THE PUBLIC

None.

FUTURE AGENDA ITEMS

None.

ADJOURNMENT

Chairwoman O'Brien adjourned the meeting at 11:10 a.m.

Respectfully submitted,

Brian Seo
Management Fellow

DRAFT



Report

Agenda Date: 12/11/2024, Item No. 2

Request Approval of the Head Start Birth to Five 2025-26 ERSEA Plan Updates - Districts 1, 3, 4, 5, 7 and 8

Request the Economic Development and Housing Subcommittee, which serves as the City of Phoenix Head Start Birth to Five Governing Board, to approve revisions to the Head Start Birth to Five Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Plan.

THIS ITEM IS FOR CONSENT ACTION.

Summary

The Head Start Birth to Five program is required to develop and implement a written plan defining the program's practices and procedures for children's eligibility, recruitment, selection, enrollment, and attendance. As the Governing Board for the Head Start Birth to Five program, the Economic Development and Housing Subcommittee is requested to approve the revised ERSEA Plan (**Attachment A**).

The Office of Head Start requires ERSEA Plans to include specifics for determining eligibility, how eligible children are recruited, establishing a viable wait list, selecting children most in need, how children will be enrolled, and tracking children's attendance. These requirements ensure that the selection of enrollees is made fairly and systematically. The selection criteria ensures that children most in need are selected first. The ERSEA Plan includes the Head Start Birth to Five program's process for alignment with other federal programs, such as the McKinney-Vento Homeless Assistance Act and the Individuals with Disabilities Education Act.

Every year, the Head Start Birth to Five staff and the Head Start Birth to Five Policy Council review and update the ERSEA Plan to address program and community needs, as well as comply with Head Start regulations. The updates for the 2025-26 ERSEA Plan align with the modifications and new rules outlined in the Head Start Program Performance Standards.

Key changes include:

- Redefining income.
- The addition of a housing adjustment calculation.

- An updated strategic plan goal for attendance.
- Incorporating points into the Selection Criteria for parents who work in Head Start.

Items in the ERSEA Plan are no long relevant and will be deleted:

- The current definition of income.
- Documents used to verify a family's financial status.
- Enrollment date for children in the Early Head Start Home-Based program.
- The requirement for parents to be working or attending school to be enrolled in the Early Head Start Center-Based program.
- Removing the old strategic plan goal.
- The elimination of points for families with childcare subsidies.

All updates are highlighted in yellow, while items being removed are highlighted in red; please refer to **Attachment A**.

Contract Term

This is the first year of a five-year contract. The contract term is from July 1, 2024, to June 30, 2025. This request does not change the term of the contract.

Financial Impact

The grant is funded by the U.S. Department of Health and Human Services, Administration of Children, Youth and Families. There is no impact to the General Fund.

Concurrence/Previous Council Action

The item was approved by the Head Start Birth to Five Policy Council on October 21, 2024.

Locations

- Alhambra Elementary School District, 4510 N. 37th Avenue
- Cartwright Elementary School District, 5220 W. Indian School Road
- Deer Valley Unified School District, 20402 N. 15th Avenue
- Fowler Elementary School District, 1617 S. 67th Avenue
- Isaac School District, 3348 W. McDowell Road
- Laveen Elementary School District, 5601 W. Dobbins Road
- Murphy Elementary School District, 3140 W. Buckeye Road
- Pendergast Elementary School District, 3802 N. 91st Avenue
- Phoenix Elementary School District, 1817 N. 7th Street
- Riverside Elementary School District, 1414 S. 51st Avenue
- Roosevelt Elementary School District, 6000 S. 7th Street

Washington Elementary School District, 4650 W. Sweetwater Avenue
Wilson Elementary School District, 3025 E. Fillmore Street
Council Districts: 1, 3, 4, 5, 7 and 8

Responsible Department

This item is submitted by Deputy City Manager Gina Montes and the Human Services Department.

ATTACHMENT A

**Human Services Department
Education Division**



City of Phoenix

HEAD START
BIRTH TO FIVE PROGRAM

ERSEA Plan
**(Eligibility, Recruitment, Selection, Enrollment, and
Attendance)**

Approved by the Head Start Birth to Five Policy Council on October 21, 2024
Approved by the Economic Development and Housing Subcommittee on

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Goals of the ERSEA Plan

The Goals of the City of Phoenix Head Start Birth to Five ERSEA Plan are:

- To specify the eligibility, recruitment, selection, enrollment, and attendance procedures of the City of Phoenix Head Start Birth to Five Program.
- To identify the roles and responsibilities of the City of Phoenix Head Start Birth to Five Program, Education Service Providers, and Child Care Partners.
- To maintain a 20% waitlist of eligible children beyond enrollment.
- To assure that efforts are made to inform and recruit potential enrollees identified as the most in need.
- Ensure that decisions regarding the selection of enrollees are made systematically and fairly based on the Selection Criteria.
- To abide by the McKinney-Vento Homeless Assistance Act as it applies to the City of Phoenix Head Start Birth to Five Programs.
- To provide the least restrictive environment placement option for children served under the Individuals with Disabilities Education Act (IDEA).

The City of Phoenix Head Start Birth to Five Selection Criteria and ERSEA Plan will be approved annually by the Policy Council and Governing Board. Approval will occur before the beginning of the intake process. However, the identification and recruitment of families is a continual effort.

Age Eligibility

Preschool children must be three or four years old before the date used to determine eligibility for the public school in the community in which the City of Phoenix Head Start classroom is located (in Phoenix, that date is generally either August 31st or September 1st, depending on the school district's kindergarten acceptance date). Children under the age of three and pregnant women are eligible for the infant-toddler programs. Children with disabilities requiring special education or related services (as determined by the Individual Education Plan) should be considered age-eligible for the City of Phoenix Head Start preschool programs as of their third birthday. Three-year-old classrooms are available based on local needs.

Serving a Birth to Five Continuum

Three-year-old children transitioning from an infant/toddler placement from another Head Start grantee (the City of Phoenix Early Head Start Program, Chicanos Por La Causa Early Head Start, Child Crisis Arizona Early Head Start, Urban Strategies Early Head Start, and Southwest Human Development Early Head Start) will be given priority consideration for acceptance into City of Phoenix Head Start preschool programs. The Birth to Five Selection Criteria supports the purpose and intent of this practice.

Eligible three and four-year-old children transitioning from other Head Start grantees will be given priority based on available space to ensure continuity of services. Eligibility will not need to be reestablished if the transfer happens during a school year for preschool or fiscal year for Early Head Start.

The City of Phoenix Head Start Birth to Three service options give priority to younger children, at-risk pregnant women, teen parents, and children with disabilities, as outlined in the Selection Criteria (Appendix A).

Income Eligibility

HSPPS [1302.12](#)

The City of Phoenix Head Start Birth to Five Program serves children from families with at-risk backgrounds.

Income based on family size is the key component in determining eligibility. The Federal Poverty Guidelines calculations are directly dependent upon the number of persons in a family. To implement the regulations regarding income, the City of Phoenix Head Start Birth to Five Program will use the definitions of "family" and "income" found in the eligibility regulations 45 C.F.R., [1305.2](#) of the Head Start Program Performance Standards (HSPPS).

In determining the size of a family, the following definition must be used. Family means *"all persons in the same household who are supported by the child's parent(s)' or guardian(s)' income; and are related to the child's parent(s) or guardian(s) by blood, marriage, or adoption; or are the child's authorized caregiver or legally responsible party."*

~~The term *income* means "gross cash income and includes earned income, military income (including pay and allowances), veteran's benefits, Social Security benefits, unemployment compensation, child support income, and public assistance benefits."~~

Income means gross income and only includes wages, business income, unemployment compensation, pension or annuity payments, gifts that exceed the threshold for taxable income, and military income (excluding special pay for a member subject to hostile fire or imminent danger under 37 U.S.C. 310 or any basic allowance for housing under 37 U.S.C. 403 including housing acquired under the alternative authority under 10 U.S.C. 169 or any related provision of law). Gross income only includes sources of income provided in this definition; it does not include refundable tax credits nor any forms of public assistance.

To accurately identify the family's income, the relevant time period must be considered. [Relevant time period](#) means a.) the 12 months preceding the month in which the application is submitted; or b.) during the calendar year preceding the calendar year in

which the application was submitted, whichever more accurately reflects the family's needs at the time of the application.

Families are considered income eligible if their annual income is at or below 100% of the Federal Poverty Guidelines.

A family whose income exceeds 100% of the Federal Poverty Guidelines is considered over-income. The Head Start Program Performance Standards allow Grantees to enroll up to 35% of the funded enrollment with children whose families are over-income and demonstrate a need for services based on the Selection Criteria.

At least 65% of enrolled children must live in families with a total annual income (before taxes) at or below 100% of the Federal Poverty Guidelines issued by the U.S. Department of Health and Human Services. Of the remaining 35%, 25% may be children whose family's income is between 100.1% and 130% of the Federal Poverty Guidelines. The remaining 10% can be children whose family's income exceeds 130% of the guidelines.

Children with identified disabilities (under IDEA) whose family's income is above 130% of the Federal Poverty Guidelines will be selected based on the percentage over income and need as demonstrated in the Selection Criteria.

HSPPS 1302.12

i) Verifying eligibility. (1) To verify eligibility based on income, program staff must use tax forms, pay stubs, or other proof of income to determine the family income for the relevant time period. (i) The program must calculate total gross income using applicable sources of income. (ii) A program may make an adjustment to a family's gross income calculation for the purposes of determining eligibility to account for excessive housing costs. A program may use available bills, bank statements, and other relevant documentation provided by the family to calculate total annual housing costs with appropriate multipliers to: (A) Determine if a family spends more than 30 percent of their total gross income on housing costs, as defined in part 1305 of this chapter; and (B) If applicable, reduce the total gross income by the amount spent on housing costs that exceed more than 30 percent. (iii) If the family cannot provide tax forms, pay stubs, or other proof of income for the relevant time period, program staff may accept written statements from employers, including individuals who are self-employed, for the relevant time period and use information provided to calculate total annual income with appropriate multipliers.

For families that are initially over income, we may make adjustments to a family's gross income based on excessive housing cost as described above.

Housing costs means the total annual applicable expenses on housing which may include rent or mortgage payments, homeowner's or renter's insurance, utilities, interest, and taxes on the home. Utilities include electricity, gas, water, sewer, and trash.

Categorically Eligible

A child living in one or more of the following situations would constitute automatic or categorical eligibility.

Families Experiencing Homelessness

- Age-eligible children experiencing homelessness as defined by the McKinney-Vento Homeless Assistance Act and the Office of Head Start. Verification can be provided in one of the following.
 - Homeless service provider
 - School personnel
 - Another service agency attesting the child is homeless
 - Self-declaration from the parent
 - Information gathered during the intake
 - Other documentation to establish homelessness

Children in Foster Care

- The foster parent must provide a *Notice to Provider* from the Department of Child Safety, or Tribal Entity (Kinship is not considered automatically eligible).

Public Assistance

A person included in the household receives one of the following.

- Temporary Assistance for Needy Families (TANF)
- Supplemental Security Income (SSI)
- Supplemental Nutrition Assistance Program (SNAP)

Documentation includes an award letter, electronic benefits card, or other documentation of eligibility.

Income Verification Process

The City of Phoenix Head Start Birth to Five Program utilizes and maintains accurate income eligibility information. Staff must review and ensure the documentation represents a relevant period of the family's income. Staff signature on the Eligibility Verification Form is proof of verification. All income documentation is uploaded into ChildPlus. Supervisors must review and approve all income eligibility documents.

Verification of the current financial status can exist on any of the following documents:

- W-2 Forms
- Individual Tax Form 1040
- Pay stubs
- Supplemental Nutrition Assistance Program Eligibility (SNAP) eligibility letter
- Supplemental Security Income decision letters
- Written statements of income from employer(s)
- Self-employed parents may use the Self-Declaration of income.
- Unemployment verification
- ~~Foster Care Reimbursement~~
- ~~Child Support Award Letters~~
- ~~College scholarships, grants, fellowships, and teaching internships. (as defined by Income 1305.2)~~

Income is verified upon entry into any of the City of Phoenix Head Start Programs and then again in the following situations.

- A child who is transitioning from the City of Phoenix Early Head Start to Head Start
- A child who will attend a Head Start preschool classroom for a third year

Recruitment Process

HSPPS [1302.13](#)

Although recruitment and outreach are conducted on a continual cycle throughout the year, more targeted recruitment and outreach efforts will begin in February to ensure full enrollment at the beginning of the school year. Recruitment and outreach efforts are the responsibility of all staff within the City of Phoenix Head Start Birth to Five Program, Education Service Providers, and Child Care Partners. Before the beginning of the enrollment year, Education Service Providers and Caseworker IIIs will create and establish a written Recruitment Plan, taking into account each Education Service Provider's unique and individual needs based on their local community.

The process for making families aware of the City of Phoenix Head Start Birth to Five opportunities includes cyclical and routine advertising, and community outreach in collaboration with the designated City of Phoenix Public Information Officer, Education Service Providers, and Child Care Partners. Pre-registration forms are completed throughout the year via the website, telephone, and during community outreach events.

Recruitment Assistance Sources

The City of Phoenix Head Start Birth to Five Program will work collaboratively with partners to recruit and identify families. Examples of partnerships include but are not

limited to:

- Phoenix Human Services Department-Community Services Division
- Local Homeless Shelters
- Head Start Parents
- Arizona Early Intervention Program (AzEIP)
- Division of Developmental Disabilities (DDD)
- Other organizations serving children from Birth to Five with disabilities
- Arizona Health Care Cost Containment System (AHCCCS)
- Local Child Find Efforts
- Agencies serving low-income families and children
- Arizona Department of Economic Security
- Local Education Agencies (LEA)
- Women, Infants, and Children Food and Nutrition Services (WIC) Offices
- Department of Child Service (DCS)
- City of Phoenix Housing Department

Recruitment of Children with Special Needs

The City of Phoenix Head Start Birth to Five Program provides the least restrictive environment for children identified under IDEA. Preference will be given to children who receive services under IDEA and are income eligible. Considerable effort and coordination are required to identify children with disabilities who may benefit from the City of Phoenix Early Head Start services.

For preschool-aged children, each Education Service Provider will work collaboratively with key staff within the local school district/s to identify children in self-contained preschool placements who may benefit from a less restrictive environment. Some children may be identified for placement in Head Start, as determined by the Individualized Educational Plan (IEP) team. When considering a City of Phoenix Head Start Birth to Five placement, a Head Start representative will be an active team member.

Education Service Providers will also work with local school districts to participate in a collaborative Child Find process to identify, place, and serve three to five-year-old children with disabilities.

All Recruitment Plans will include outreach that intentionally markets to community agencies that serve children with disabilities. Children may participate in dual programs.

An Education Service Provider, which is also a local education agency, must develop written documentation of the district's policies and procedures for placement of students with I.E.P.s and assurance of the 10% mandate.

Non-profit Education Service Providers will collaborate with the local school district to create a formalized agreement, such as a Memorandum of Understanding (MOU), to outline specific responsibilities for ensuring the 10% mandate.

Enrollment in other therapy services or programs is not a basis for exclusion in a City of Phoenix Head Start Birth to Five Program.

Intake Process

Conducting intakes in person is best practice; however, other meetings may occur based on the family's situation or in the event of a pandemic.

- The caseworker may conduct a home visit
- The intake occurs in an agreed-upon public space
- The intake takes place over the phone or virtual platform

The intake processes for first-year families will include the following:

- Scheduling of intakes appointments
- Short screening via phone
- Verification of family's income
- Proof of the child's age
- Verification of address
- Determination of eligibility

City of Phoenix Head Start Birth to Five staff will complete the following at the intake in ChildPlus:

- Application
- Health/Medical History
- Nutrition screening
- Immunizations
- Family Outcomes Pre-Assessment
- Verification of Eligibility (must be signed by the caseworker who conducted the intake)
- Grant or Deny
- Selection Criteria
- Verification of Address
- Enrollment Agreement

A review of medical requirements and immunization status will include the following:

- Explanation of health requirements and resources provided, as needed
- Distribution of physical exam form
- Distribution of dental exam form
- Review of immunization status and distribution information on immunization fairs
- Distribution of special health and nutrition forms (SAM – Special Meal Modification Form, Asthma Information Referral, or Medical Information Referral)

to gather information from the child's health care provider regarding health or nutrition accommodations or medication children may need in school or childcare.

A family will not be denied an intake if unable to verify the child's age (i.e., birth certificate, passport, or baptism records). The caseworker will assist the family in obtaining appropriate documents.

Approved address verification documents include the following within the last 30 days.

- Lease agreements or mortgage statements
- Utility bills – water, electric, gas, cable, or internet
- Federal Documents –
 - Supplemental Security Income (SSI),
 - Social Security Administration letter
 - Tax Returns, or
- State of Arizona Documents –
 - Arizona Health Care Cost Containment System (AHCCCS) determination letters
 - Arizona Department of Economic Security (DES) letters
 - Supplemental Nutrition Assistance Program Eligibility (SNAP)determination letters
- City of Phoenix Property Tax Statement
- Shared residency verification/letter accompanied by a current utility bill or rental agreement

If the intake is conducted via phone or virtually, the family will sign all documents electronically.

Serving Multiple Children in the Same Family

When multiple age-eligible children are in the home, an intake will be completed for the family by the same caseworker. Families who have children enrolled in multiple services options will have one caseworker as their point of contact; all caseworkers will support the family (i.e., if the family is enrolled in the Early Head Start Home-Based program, more than likely that Caseworker would be the point of contact due to the weekly visits with the family).

The point of contact will communicate their role to the family and describe the support they will be given throughout the program year. The point of contact and other caseworkers involved with the family will have regularly scheduled staffing to stay updated on their assigned family's status and progress. A summary of these meetings will be documented in ChildPlus.

Selection Process

The City of Phoenix Head Start Birth to Five Program has formal written processes for

HSPPS [1302.14](#)

selecting families with a Selection Criterion that considers income, age, disabilities, and needs identified by the community assessment and families with at-risk backgrounds.

The approved City of Phoenix Head Start Birth to Five Selection Criteria will be uploaded into ChildPlus no later than February 1st. This will allow caseworkers to conduct first-year intakes for siblings during the intake for second-year children.

The City of Phoenix Head Start Birth to Five staff will begin selecting second-year preschool children for enrollment during February and March: birth to three selection is ongoing throughout the year. City of Phoenix Head Start Birth to Five staff will begin selecting first-year children into the program starting in March. Education Service Providers will have access to a list of children who have been accepted into the program but may not be placed in a classroom.

Eligible children will be approved in ChildPlus and placed on either the waitlist or in a classroom. Children who are found to be not eligible will be provided with referrals and resources for other agencies and supports.

Caseworker IIIs will place a child on the waitlist when:

- Before the school year starts, the child's Selection Criteria are less than 5 points.
- The school year is in progress, and there are no available openings

Caseworker IIIs will place a child in a classroom when;

- Before the school year starts, the child's Selection Criteria are 5 points or higher.
- The child is re-enrolling for a second year
- The school year is in progress, and there are available openings.

Caseworker IIIs and Education Service Providers will collaborate on the child's final placement before contacting the family.

A waitlist that ranks children based on the Selection Criteria will be maintained throughout the year in ChildPlus, available to both the Education Service Provider and the caseworker. This list will be used to ensure eligible children enter the program as vacancies occur. As vacancies occur during the school year, the Education Service Providers and Caseworkers will collaboratively identify and notify families to fill the vacancies.

No child will be denied placement in a City of Phoenix Head Start preschool classroom due to any chronic health condition or not being toilet trained.

Notification of Enrollment

All families completing an intake in the City of Phoenix Head Start Birth to Five Programs are notified in writing, text, or telephone of their enrollment status. All eligible families will be placed either on a class list or a waiting list.

Enrollment

The enrollment date is the first date the child attends school for center-based programs or the first home visit ~~or service~~ for home-based programs. Enrollment is documented in ChildPlus by the City of Phoenix Head Start Birth to Five caseworkers.

Each child enrolled in the City of Phoenix Head Start Birth to Five Program must be allowed to remain in the Program until a natural transition, as defined in 45 C.F.R., Eligibility Duration of the HSPPS; an exception to this would be if the family moves out of the service area.

Enrollment for More Than One Year

An income-eligible child who participates in a City of Phoenix Head Start preschool program remains income eligible through the end of the succeeding enrollment year. Children enrolled in a City of Phoenix Head Start infant-toddler program remain income-eligible while participating in the program up to their third birthday. If a child turns three during the school year, the toddler program will provide services, if appropriate and available, for that child until a City of Phoenix Head Start preschool option becomes available.

Children enrolled in the preschool option will be considered eligible until kindergarten entry eligible, except in extenuating circumstances where the Head Start program may choose not to enroll a child when there are compelling reasons for the child not to remain in Head Start.

Re-enrollment

A child can be considered for re-enrollment as long as the family resides in the service area and the request is within the same school year for preschool and the same calendar year for infant-toddler programs. Eligibility will have to be re-verified to ensure they are still eligible. If the request is outside these parameters, an intake must be conducted to ensure the family meets the eligibility requirements. A re-enrollment request may also be denied if children on the waitlist have higher needs based on the Selection Criteria.

Alternative Placement/Drop Policy

Once a child is enrolled, and concerns arise regarding the child's individual needs, a multi-disciplinary team meeting must occur to discuss the concerns and related services available. The child's parent/guardian will be invited to participate in this meeting and be a critical part of the multi-disciplinary team. This pertains to all City of Phoenix Head Start children, not just children with disabilities. No child will arbitrarily be withdrawn from the City of Phoenix Head Start Birth to Five Program.

No child shall be withdrawn from the program based solely on a parent/guardian's lack of participation in the program or failure to meet its requirements.

It is the responsibility of all City of Phoenix Head Start Birth to Five staff, Education Service Providers, and Child Care Partners to inform parents of the impact attendance has on a child's educational experience and work with those parents whose children have chronic absenteeism. Withdrawing children from the program based on chronic absenteeism will only be done to remain in compliance with 45 C.F.R., 1302.15(a) *"Funded enrollment. A program must maintain its funded enrollment level and fill any vacancy as soon as possible. A program **must fill any vacancy within 30 days**".* Parents/guardians will be notified if the child is dropped from the program by phone, text, email, mail, or home visit. The Caseworker shall be notified of the child's withdrawal and document the appropriate withdrawal date in ChildPlus.

In the Home-Based program, two appointments where the parent is not home during the scheduled appointment and has not contacted the caseworker may result in the family being withdrawn from the program. Attendance letters will be sent to families identifying the number of missed appointments before withdrawal from the program. The parent/guardian may be informed by phone, text, or letter that they have been withdrawn. The withdrawal date is the last date of contact with the family.

Transfer Process

Enrolled children transferring from and to another City of Phoenix Head Start Birth to Five Program will be enrolled if a slot is available to ensure a continuation of services. If a slot is not available, the child will be placed at the top of the waiting list. If the family is willing to keep the child enrolled in the original Education Service Provider, permission from both directors must be obtained by the current Caseworker III. The Caseworker III will ensure verification of new address is updated, documented in the Enrollment tab, and proof of address is uploaded into ChildPlus. The current Caseworker III will communicate the transfer via email to receiving Caseworker III. It is the responsibility of the receiving Caseworker III to place the child in an age-appropriate classroom in ChildPlus and communicate the status with the family. To ensure additional information is being transferred and completed (DECA, Developmental Screener, etc.), the receiving Caseworker III will notify the Education Service Provider and the Behavioral Support Content Specialist of the transfer. Once the transfer is complete and the child is enrolled, the receiving caseworker will schedule a staffing with both transfer sides to discuss the family's case.

~~City of Phoenix Early Head Start children may transfer from one program option to another when family employment circumstances change. The home-based program is available for non-working parents/guardians, and the childcare partnership option is available for full-time working parents or students enrolled in school.~~

Enrollment Lists

Enrollment lists are developed for each program option. Children are placed on class lists in the center-based option or on caseloads in the Home-Based program, based on the service area. In the center-based preschool option, children are placed in classrooms as close as possible to their homeschool. Efforts will be made to maintain a 20% waitlist. Once filled, the remainder of the children seeking placement in that location will be placed on a waitlist. When a vacancy occurs, children from the waitlist are considered based on needs determined by the Selection Criteria.

Attendance and Absenteeism

Promoting and tracking attendance is a strong focus in the City of Phoenix Birth to Five Program, supported in the school readiness plan and strategic plan goals. Attendance is taken daily and entered into the ChildPlus system within the first hour of class beginning. If a child is absent and the parent/guardian has not notified the program within the first hour of class, the program will reach out to the family to ensure the child's safety. Attendance is monitored weekly by the caseworker through ChildPlus reports and the classroom sign-in log. Monitoring of attendance will identify consecutive absences or patterns of absenteeism to address with the family. After three consecutive absences, the teacher will generate a referral to the caseworker. Collaboration and communication between the classroom teacher and the caseworker are vital to support families in promoting their regular attendance. ~~To accomplish the strategic plan goal of a 95% attendance rate and reduce the number of children considered chronically absent by 10% each year through 2024,~~ **To accomplish the strategic plan goal of increasing attendance,** the City of Phoenix Birth to Five Program will work collaboratively with Education Service Providers to provide attendance incentives programs. If a caseworker identifies a child with two or more absences in one month, the family is contacted to determine the reason for the absences. Depending on the situation, a student success plan may be developed to help the parent overcome the barriers to getting the child to school on time and regularly. Any attendance follow-up will be entered into ChildPlus under the attendance tab. Casework staff monitor the child's attendance and continue to work with the parent to ensure successful attendance. If a caseworker creates a student success plan and attempts to reengage the family, but the child stops attending the program, the slot will be considered vacant.

Vacancy Policy

All vacancies must be filled from the prioritized waitlist within thirty (30) calendar days from the last day the child attended, which aligns with 45 C.F.R. 1302.15(a) "*A program must maintain its funded enrollment level and fill any vacancy as soon as possible. A program must fill any vacancy within 30 days.*"

A home-based option slot shall be considered vacant after the last contact between the assigned caseworker and the family.

A center-based slot shall be considered vacant the day after the child's last day of attendance.

The caseworker must be informed of a newly enrolled child on the child's first day of attendance to ensure the child is enrolled in ChildPlus and screening deadlines are established.

DRAFT

Appendix A

City of Phoenix Head Start Birth to Five 2025-2026 Selection Criteria

A.G.E. Birth to 3			
1.	0 – 11 months		3
2.	12- 23 months		2
3.	24 – 36 months		1
PARENTAL/CCDF STATUS (EHS CCP only)			
4.	Has a CCDF Subsidy		2
5.	Qualified for CCDF (on DES waitlist)		1
DISABILITIES			
6.	Child born premature (before 36 weeks) EHS ONLY		2
7.	Has a current IFSP/IEP		2
8.	Child with documented referral or diagnosis of developmental delay		1
9.	Child receiving therapy from a private agency		1
10.	Parent/Guardian and/or sibling with documented disability		1
PARENTAL STATUS			
11.	Child in Foster Care		2
12.	Kinship – relative/guardian is caring for the child		2
13.	Teen parent at the time of registration (18 years old or younger)		2
14.	Teen parent at the time of child's birth (18 years old or younger)		1
15.	Parenting single		1
16.	Parent education level 8 th grade or less		1
	Parent works for Head Start		2
OTHER FACTORS			
17.	Transition from EHS/HS to HS		2
18.	Continuity of Care- Siblings in EHS/HS		1
19.	Refugee		2
20.	TANF/SSI/SNAP		1
21.	Three or more children under the age of 5 living in the home.		1
CRISIS			
22.		Is currently abusing substances (drugs or alcohol)	2
23.	Any member in the home who:	Is currently incarcerated or has been at some point since the child was born	2
24.		Has a mental health diagnoses or receiving mental health treatment	2
25.	History of D.C.S. involvement		2
26.	History of domestic violence within the last six years		2
27.	Family separated due to crisis		2
28.	Family Experiencing Homelessness		3
TOTAL POINTS			

DESCRIPTION	
1.– 3.	Higher points for younger children allowing families to remain in the program for up to three years.
4.– 5.	Child Care and Development Fund Subsidies – participation in EHS Child Care Partner classrooms
6.	Children born prematurely have a higher likelihood of experiencing developmental delays
7.	The child has an official Individualized Family Service Plan (IFSP, 0 – 3) or an Individualized Education Plan (IEP, 3 – 5). The parent must be able to provide a copy.
8.	The child has a referral for an evaluation with a government/private agency, local school district, or appointment with a developmental pediatrician. The child has a diagnosis of developmental delay by a government/private agency, local school district, or developmental pediatrician and is either in the process of obtaining an IFSP/IEP or does not require special education services at this time for identified diagnosis.
9.	The child is currently receiving therapy services through a private agency, and the parent is able to provide documentation.
10.	The parent/guardian or the child's sibling has a documented disability (i.e., physical, sensory, cognitive, or social/emotional – does not include mental or medical disabilities).
11.	The child is placed with a foster family, in a group home, or shelter by DCS (Department of Child Services)
12.	The child is living with a relative – D.C.S. may or may not be involved.
13.	The parent is currently 18 years old or younger during registration.
14.	The parent was 18 years old or younger when the child was born.
15.	The parent/guardian is the only adult in the home caring for the child/children.
16.	One or both parents/guardians attended school up to the 8 th grade or less, did not go to high school.
17.	The child participated in another EHS/HS program (i.e., it does not matter where they participated).
18.	The family has children in both EHS and HS, including children enrolled in another grantee's Early Head Start program.
19.	A family who has or is experiencing resettlement in the United States through a resettlement organization.
20.	The family (EHS/HS household) is receiving TANF (Temporary Assistance for Needy Families), or SNAP (Supplemental Nutritional Assistance Program). Anyone in the EHS/HS household who is receiving S.S.I. (Supplemental Security Income).
21.	It does not need to be children included in the household, currently living in the home.
22.	Anyone living in the home who uses illegal drugs, abusing prescription drugs, and/or abusing alcohol per parent/guardian completing intake.
23.	Anyone living in the home who has been in prison for an extended period and/or jailed for short periods may or may not be reintegrated into the home but impacts the child's life.
24.	Anyone living in the home who is currently under a doctor's care has atypical behavior due to diagnosed disorder and/or has been identified as having a disorder that may impact the child(ren).
25.	The parent or guardian had or currently has an open case, and/or children have been removed from the home, including before the child's birth.
26.	May include sexual, physical, and/or emotional abuse involving parent(s) or guardian(s) of the child(ren).
27.	Includes the following; divorce, separation, deportation, and death.
28.	Identify if the family is in temporary housing or if their current housing situation is permanent. <i>McKinney-Vento definition of homeless – "children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in a motel, hotel, trailer park (in a tent or other type of substandard housing), camping grounds due to lack of adequate alternative accommodations; are living in emergency or transitional shelters."</i>



Report

Agenda Date: 12/11/2024, Item No. 3

Approval of Head Start Birth to Five Standards of Conduct Policy - Districts 1, 3, 4, 5, 7 and 8

This report requests the Economic Development and Housing Subcommittee, which serves as the City of Phoenix Head Start Birth to Five Governing Board, to approve the revisions to the Head Start Birth to Five Standards of Conduct Policy.

THIS ITEM IS FOR CONSENT ACTION.

Summary

The Office of Head Start mandates that all grantees create and implement a written Standards of Conduct policy. The policy must outline the responsibilities of all staff, consultants, contractors, and volunteers to guarantee the health and safety of enrolled children.

Recently, the Head Start Birth to Five program updated its policy as part of the Risk Assessment Notification process initiated by the Office of Head Start. This process followed the violation of the Standards of Conduct by three staff members from one of the Child Care Partners. The Economic Development and Housing Subcommittee approved the revised policy on June 12, 2024. On August 21, 2024, the Office of Head Start issued the Final Rule regarding changes to the Head Start Program Performance Standards, which included an update to the Standards of Conduct. Consequently, the Head Start Birth to Five Program has revised its Standard of Conduct Policy to align with the Office of Head Start changes.

The Office of Head Start has revised the Standards of Conduct to be more concise by establishing four main categories that cover all forms of inappropriate treatment of children. The categories are:

- Corporal punishment, this includes all forms of physical abuse.
- Sexually abusive behaviors that is defined as any attempt, contact, or exploitation involving sexual acts.
- Emotional harmful behaviors are defined as actions that damage a child's self-worth or emotional well-being.
- Neglectful behaviors that include leaving children unsupervised.

These updates aim to clarify the expectation for child treatment and ensure safe learning environments for children.

See **Attachment A** for the revised policy, revisions are highlighted in yellow.

Concurrence/Previous Council Action

The item was approved by the Head Start Birth to Five Policy Council on October 21, 2024.


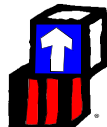
Locations

Alhambra Elementary School District, 4510 N. 37th Avenue
Cartwright Elementary School District, 5220 W. Indian School Road
Deer Valley Unified School District, 20402 N. 15th Avenue
Fowler Elementary School District, 1617 S. 67th Avenue
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Roosevelt Elementary School District, 6000 S. 7th Street
Washington Elementary School District, 4650 W. Sweetwater Avenue
Wilson Elementary School District, 3025 E. Fillmore Street
Council Districts: 1, 3, 4, 5, 7 and 8

Responsible Department

This item is submitted by Deputy City Manager Gina Montes and the Human Services Department.

ATTACHMENT A

 <p style="margin: 0;">CITY OF PHOENIX Human Services Department Education Division</p> 	
Standards of Conduct	POLICY NUMBER: HR-04
SUBJECT: Professional Expectations of Staff, Volunteers, and Consultants	PERFORMANCE STANDARD(S): 1302.90(c)(1) and 1302.90 (c)(2).
PROGRAM AREA: Human Resources	
Revisions approved by the Policy Council on October 21, 2024.	EFFECTIVE DATE: 1/18/11 Revised 6/15/11; Revised 4/16/2024; Revised 10/1/2024

POLICY

The City of Phoenix Head Start Birth to Five Program has set high standards of conduct for its employees, contractors, partners, volunteers, and consultants. It is of utmost importance that all staff members are aware of their roles and responsibilities in ensuring the safety and security of all enrolled children. To achieve this, all staff must abide by the Head Start Program Performance Standard on safety practices and standards of conduct. This policy outlines the Head Start Birth to Five program’s method of sustainable implementation by the current employees in accordance with the Head Start Program Performance Standard 1302.90(c)(1) and 1302.90(c)(2).

The following applies to all Head Start Birth to Five Program staff, Education Service Providers (ESP) staff, contracted staff, interns, and volunteers (referred to as “persons”).

NEW PERSONS TO THE PROGRAM

- Before any person can provide services or work with children, the assigned supervisor must ensure the person has participated in the two-hour Standards of Conduct training in EDvantage.
- When the person has completed the training, the assigned supervisor will meet with them to review and sign the Head Start Birth to Five Program Standards of Conduct.

PROFESSIONAL DEVELOPMENT

- All persons, as identified above, will receive professional development every quarter to ensure that they understand the expectations set forth in the standards of conduct. The professional development content will cover appropriate behaviors and actions that promote safe learning environments. Additionally, it will explicitly outline any inappropriate behaviors and actions that staff members are prohibited from implementing within the learning environment.
- The Head Start Birth to Five Program will ensure that the Standards of Conduct Policy is reviewed and signed annually by all persons involved in the program.

MONITORING IMPLEMENTATION AND VIOLATIONS

- Implementation of the Standards of Conduct policy will be monitored through observations.
- If a violation is observed, the observer will immediately take action by stepping in to support the classroom staff in addressing the incident and reporting to the Deputy Director and the ESP director.

REPORTING VIOLATIONS

- All violations of the Standards of Conduct policy must be reported within 24 hours to one of the Head Start Birth to Five administrative staff: Program Coordinators or the Deputy Director.
- If any violation of the Standards of Conduct policy leads to a significant incident that affects the health and safety of a child or children, it is mandatory to report it to the Arizona Department of Child Safety and/or the Arizona Department of Health Services, Child Care Licensing Bureau. The person who witnessed the violation or has knowledge of it must report it immediately.
- The violation must be reported via a Child Incident Report in ChildPlus within three (3) calendar days.
- The Deputy Director will use the information in the Child Incident Report to submit a comprehensive report to the Office of Head Start within seven (7) calendar days of the incident (45 CFR §1302.102). This includes any violations of supervision, unauthorized release, or inappropriate discipline.
- The agency the violator reports to will follow their discipline policy and report the outcome to the Head Start Birth to Five Deputy Director within 14 calendar days.

FOLLOW-UP AFTER A VIOLATION

- The Head Start Birth to Five administration will work with the Education Service Provider or agency to identify the root cause of the violation.
- After collecting information, the Head Start Birth to Five team will provide further support through professional development, classroom modeling, or other appropriate actions.

**City of Phoenix Head Start Birth to Five Program
Universal Standards of Conduct Agreement**

I, _____ understand the importance and role of the Head Start Program staff in maintaining safety and security for all children enrolled and will follow the Head Start Program Performance Standard on safety practices and standards of conduct.

- I will respect and promote the unique identity of each Head Start Birth to Five Program individual and colleague and refrain from stereotyping on any basis of race, gender, ethnicity, culture, religion, disability, sexual orientation, family composition, or gender identity.
- I will comply with program confidentiality policies concerning personally identifiable information about children, families, and other staff members in accordance with subpart C of part 1303 of this chapter and applicable Federal, State, local, and Tribal laws
- I will ensure no child is left alone and unsupervised while under my care.
- I will implement positive strategies to support children's well-being and prevent and address children's challenging behavior.

I understand that I must not engage in behaviors that maltreat or endanger the health or safety of children, including, at a minimum:

(A) Corporal punishment or physically abusive behavior, defined as the intentional use of physical force that results in, or has the potential to result in physical injury. Examples include, but are not limited to, hitting, kicking, shaking, biting, pushing, restraining, force-feeding, or dragging;

(B) Sexually abusive behavior, defined as any completed or attempted sexual act, sexual contact, or exploitation. Examples include, but are not limited to, behaviors such as inappropriate touching, inappropriate filming, or exposing a child to other sexual activities;

(C) Emotionally harmful or abusive behavior, defined as behaviors that harm a child's self-worth or emotional well-being. Examples include but are not limited to, using seclusion, using or exposing a child to public or private humiliation, name-calling, shaming, intimidating, or threatening a child, and

(D) Neglectful behavior, defined as the failure to meet a child's basic physical and emotional needs, including access to food, education, medical care, appropriate supervision by an adequate caregiver, and safe physical and emotional environments. Examples include, but are not limited to, leaving a child unattended on a bus, withholding food as punishment, or refusing to change soiled diapers as punishment;

I will not solicit or accept personal gratuities, favors, or anything of significant monetary value from contractors, potential contractors, and families.

I have read the Standards of Conduct policy and participated in professional development to further my knowledge. Failure to adhere to these standards may result in discipline, up to and including termination of employment or services.

Printed Name: _____

Signature: _____

Title: _____

Date: _____

_____ Initial



Report

Agenda Date: 12/11/2024, Item No. 4

Head Start Birth to Five Program 2023-2024 School Readiness Outcomes and Program Information Reports - Districts 1, 3, 4, 5, 7 and 8

This report provides the Economic Development and Housing Subcommittee, which serves as the City of Phoenix Head Start Birth to Five Governing Board, the results of the 2023-2024 School Readiness Outcomes and the Program Information Report.

THIS ITEM IS FOR INFORMATION ONLY.

Summary

School Readiness Outcomes

Head Start Program Performance Standards require the City of Phoenix, as the Head Start Grantee, to provide its governing board data on health, program operations, family engagement, family services, and children's educational outcomes annually. The school readiness data focuses on two areas: child outcomes and family outcomes. **See Attachments A through F.**

Child Outcomes

School Readiness data is collected and analyzed three times per year using Teaching Strategies Gold, which measures children's progress in all developmental areas. The first reporting period (Time 1) occurs at the end of the first six weeks of the school year, the second (Time 2) is in the middle of the school year, and the third (Time 3) occurs at the end of the school year. The School Readiness Outcomes data is used by Head Start Birth to Five staff to determine the professional development needs of the Education Service Providers and Child Care Partners instructional staff who create learning experiences that meet and enhance the developmental needs of children.

Attachments A and B illustrate the growth of infants and toddlers (from birth to age two) enrolled in the Early Head Start Center-Based and Home-Based programs. Demonstrating progress in this age group is challenging due to the fact that children age out during the program year and new children enter. This turnover can give the impression that developmental growth is slow or not sequential. For instance, in the Early Head Start Center-Based program (**Attachment A**), in the area of Mathematics, 76 percent of the children were within their expected age range at Time 1. This percentage increased during Time 2, but then decreased by Time 3. A similar pattern is

observed in the Early Head Start Home-Based program as well (**Attachment B**).

Attachment C illustrates consistent developmental growth among preschool children (ages three to five) throughout the school year. Although there is some turnover in preschool programs, it is not as significant as that seen in Early Head Start programs. The most notable gains in development occurred in the areas of math and literacy, while the smallest improvements are observed in physical development. This suggests that children enter preschool with good physical skills, such as running, jumping, and grasping small objects. However, while children are exposed to math and literacy concepts before entering preschool, their skills in these areas have not yet been fully developed.

Family Outcomes

The strength and stability of families are essential to advancing School Readiness for children. Data related to family outcomes is based on a family's vulnerable area(s), identified through the Family Outcomes Profile. The Family Outcomes Profile rates a family's strength and stability on a scale from one (In Crisis) to ten (Empowered/Thriving). Caseworkers work with families to develop Family Partnership Agreements that contain goals focused on improving identified vulnerable areas.

Attachment D and E presents the progress of families enrolled in the Early Head Start Center-Based (**Attachment D**) and Home-Based (**Attachment E**) programs. The most significant improvement was observed in the area of Child or Other Dependent Care in both groups, while the area with little movement was in the area of Substance Abuse. At the beginning of the program year (July) in the Center-Based program, the average score was 4.5 (Safe), which increased to an average score of 7 (Stable-Building Capacity) by the end of the year. The results are similar with the families in the Home-Based program. The area of Substance Abuse is a topic that families often find difficult to discuss or may hesitate to acknowledge as needing support, which results in little to no progress.

Attachment F illustrates the progress made by families in preschool. The area with the most significant improvement is Parenting. Families in this area began with an average score of 6.9 (Safe) and increased to a score of 7.5 (Stable). This achievement resulted from the various parenting education trainings offered throughout the year. Substance Abuse trends are similar in the preschool program as they are in the Early Head Start programs.

Program Information Report

The Office of Head Start requires the City of Phoenix, as the Head Start Grantee, to submit a Program Information Report annually. This report provides comprehensive

data on the services provided to families, staff qualifications, information relevant to children's health, and family demographics in the Early Head Start and Head Start programs. The data collected is used to make informed programmatic decisions.

Attachment G identifies 2023-2024 data for the Head Start Birth to Five Program, in Arizona, and nationally.

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Council Districts: 1, 3, 4, 5, 7 and 8

Responsible Department

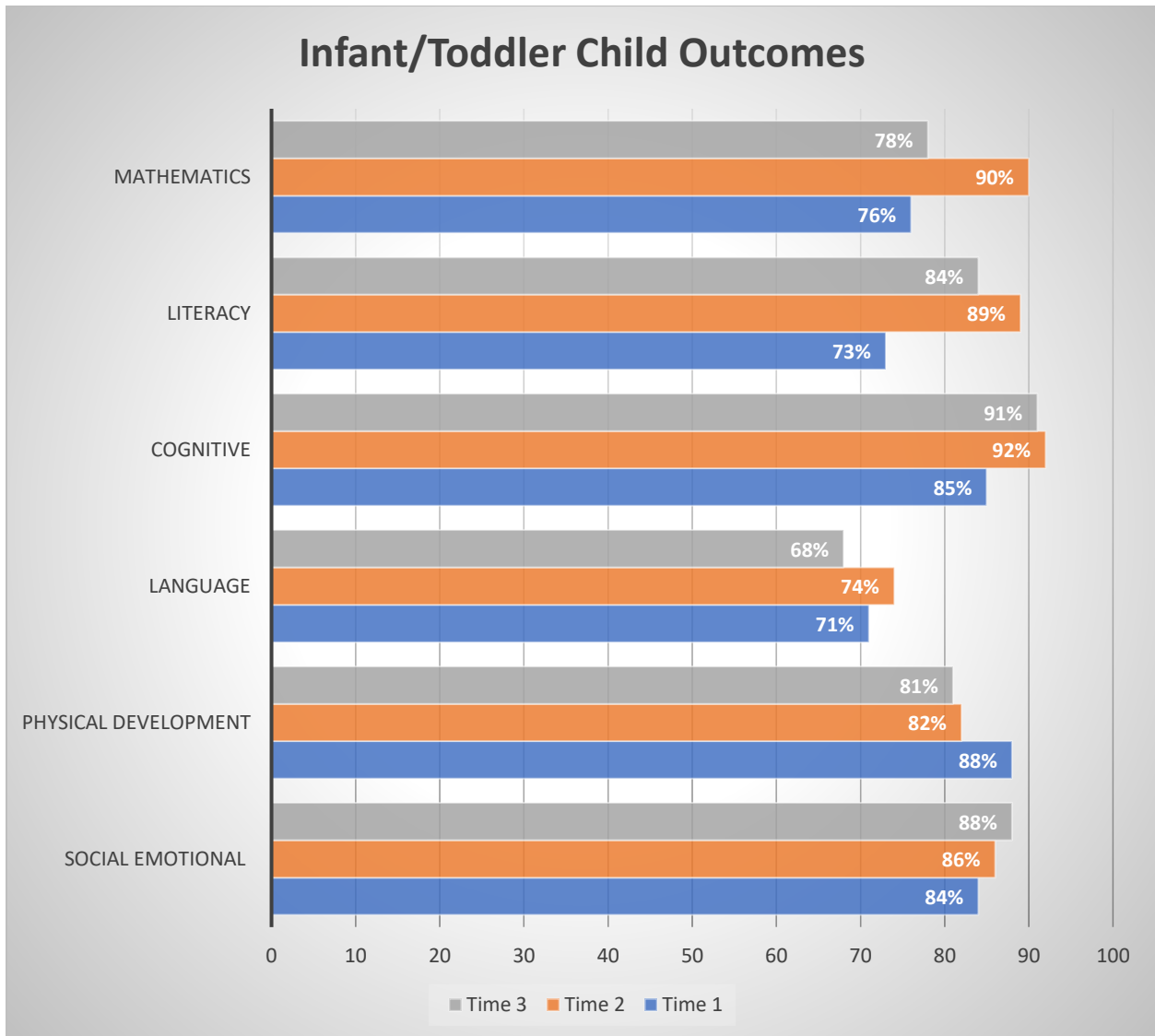
This item is submitted by Deputy City Manager Gina Montes and the Human Services Department.

ATTACHMENT A

Early Head Start Center-Based Child Outcomes 2023-2024

Tracking children's growth and development is vital for offering personalized educational support, identifying any possible developmental delays, and ensuring that children are learning skills that align with their age-related developmental milestones.

The accompanying graph visually represents the percentage of children in the center-based program, from birth to three years of age, who have achieved the skill sets that are considered developmentally appropriate for their respective ages. This information is essential for understanding how children are progressing in their early years.



Time 1 – Baseline assessment data within the first six weeks of the new program year.

Time 2 – Refers to the mid-point of the program year data.

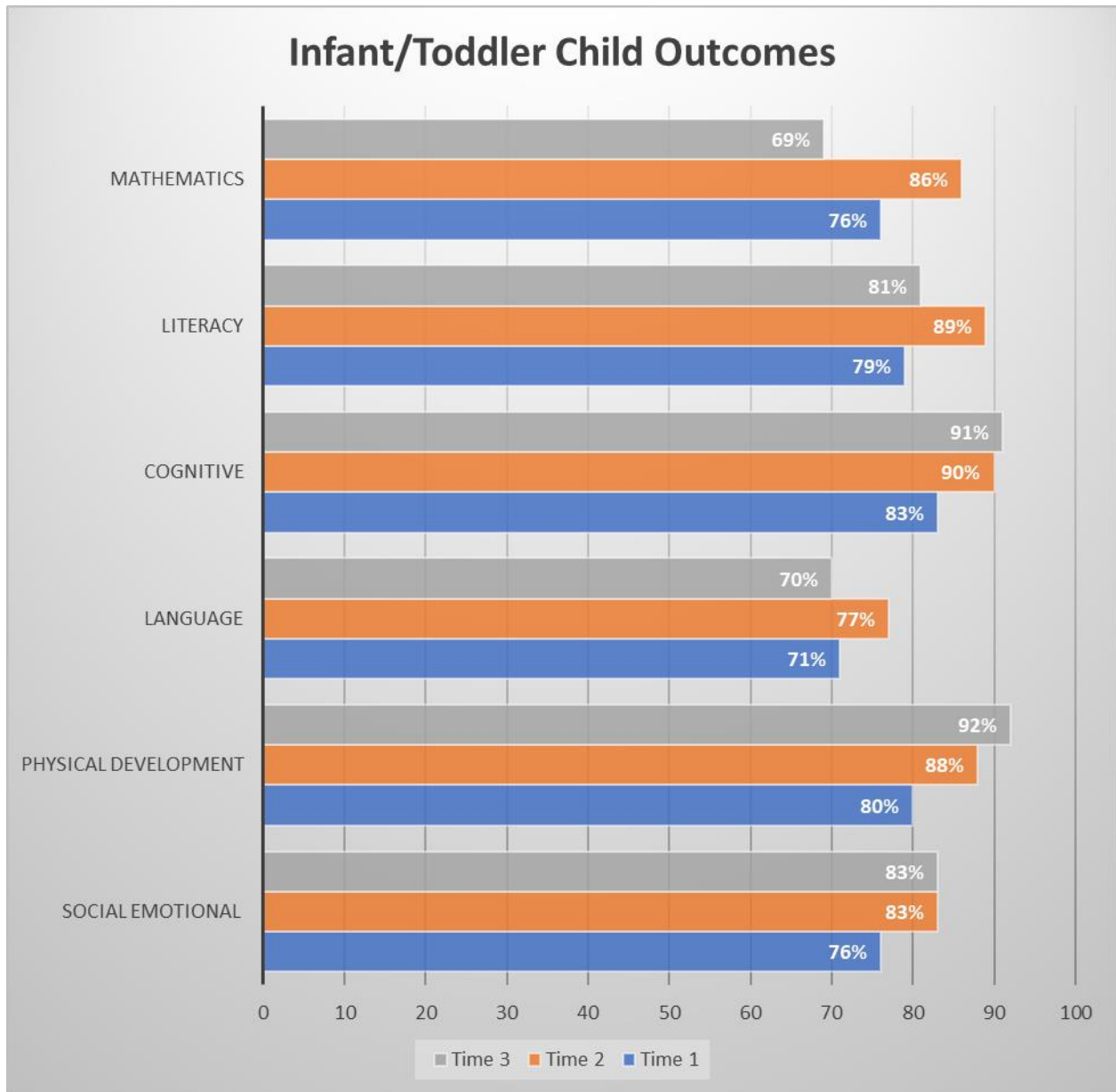
Time 3 – Refers to the end of the program year data.

ATTACHMENT B

Early Head Start Home-Based Child Outcomes 2023-2024

Tracking children's growth and development is vital for offering personalized educational support, identifying any possible developmental delays, and ensuring that children are learning skills that align with their age-related developmental milestones.

The accompanying graph visually represents the percentage of children in the home-based program, from birth to three years of age, who have achieved the skill sets that are considered developmentally appropriate for their respective ages. This information is essential for understanding how children are progressing in their early years.



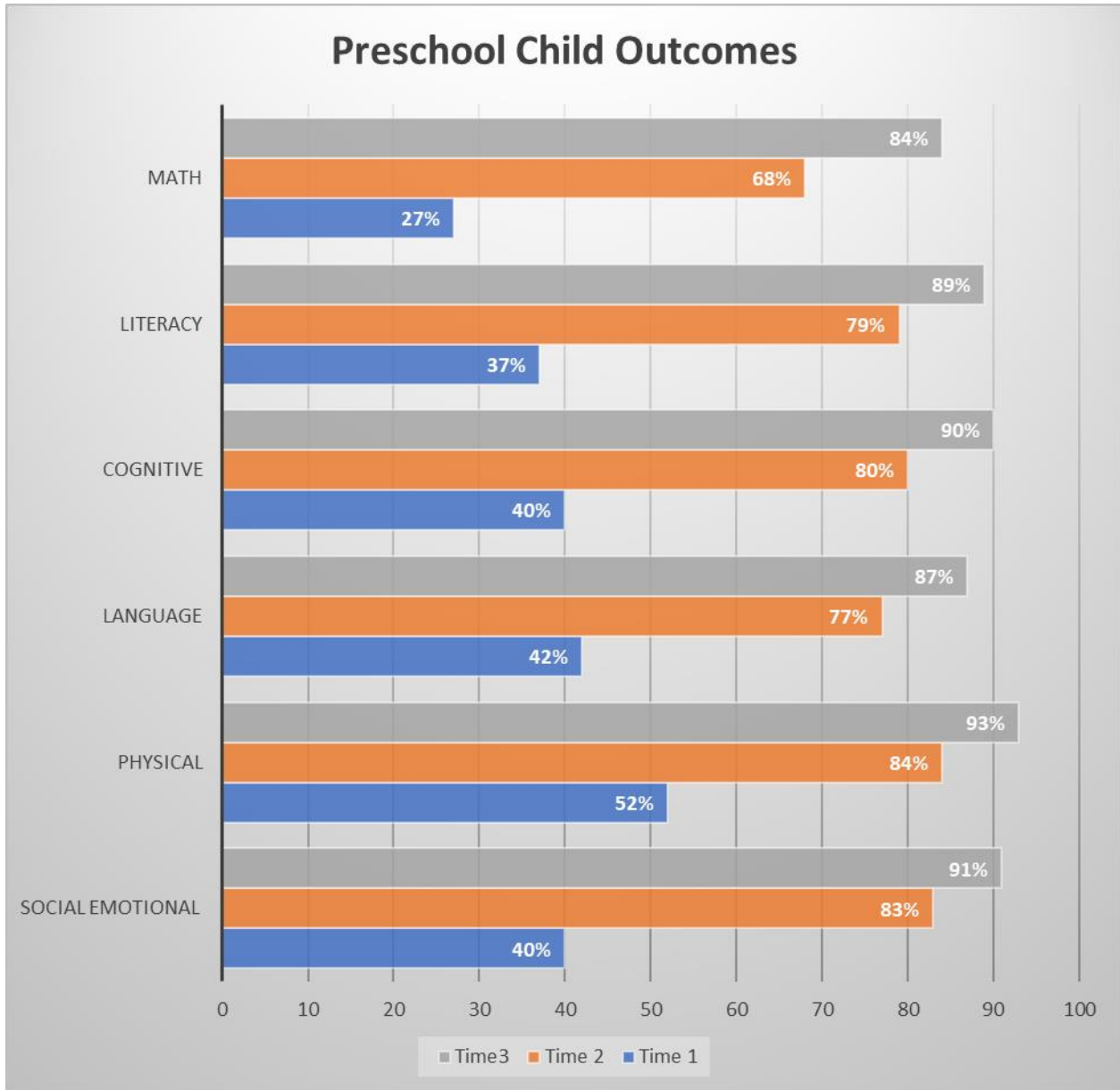
Time 1 – Baseline assessment data within the first six weeks of the new program year.
Time 2 – Refers to the mid-point of the program year data.
Time 3 – Refers to the end of the program year data.

ATTACHMENT C

Head Start Preschool Child Outcomes 2023-2024

Tracking children's growth and development is vital for offering personalized educational support, identifying any possible developmental delays, and ensuring that children are learning skills that align with their age-related developmental milestones.

The accompanying graph visually represents the percentage of children in the preschool program, from three to five years of age, who have achieved the skill sets that are considered developmentally appropriate for their respective ages. This information is essential for understanding how children are progressing in their early years.

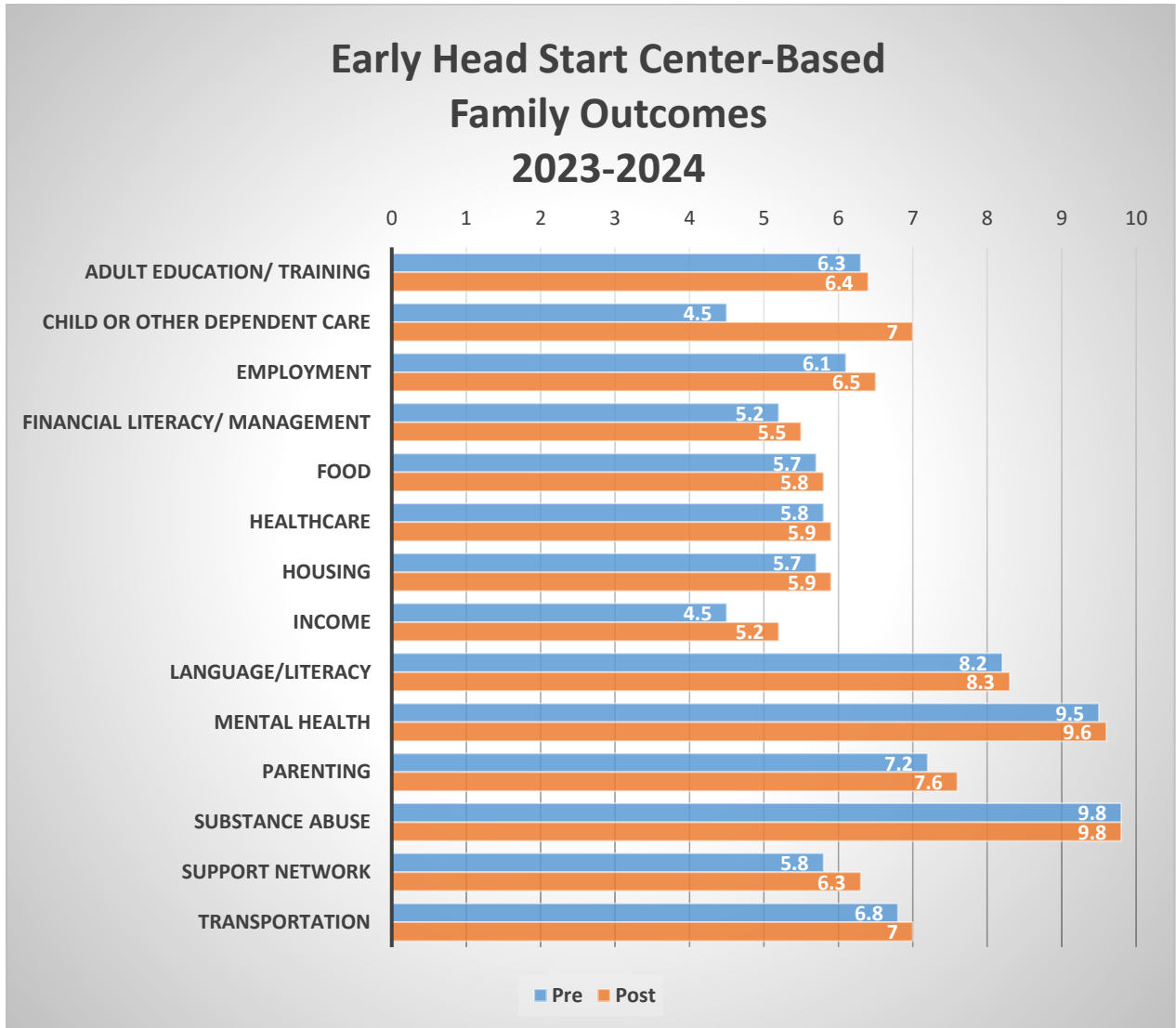


Time 1 – Baseline assessment data within the first six weeks of the new program year.

Time 2 – Refers to the mid-point of the program year data.

Time 3 – Refers to the end of the program year data.

ATTACHMENT D



A family's vulnerable areas are assessed during the initial application process (Pre) and reassessed within 30 days of the end of the program year (Post).

0 - 2 = In Crisis

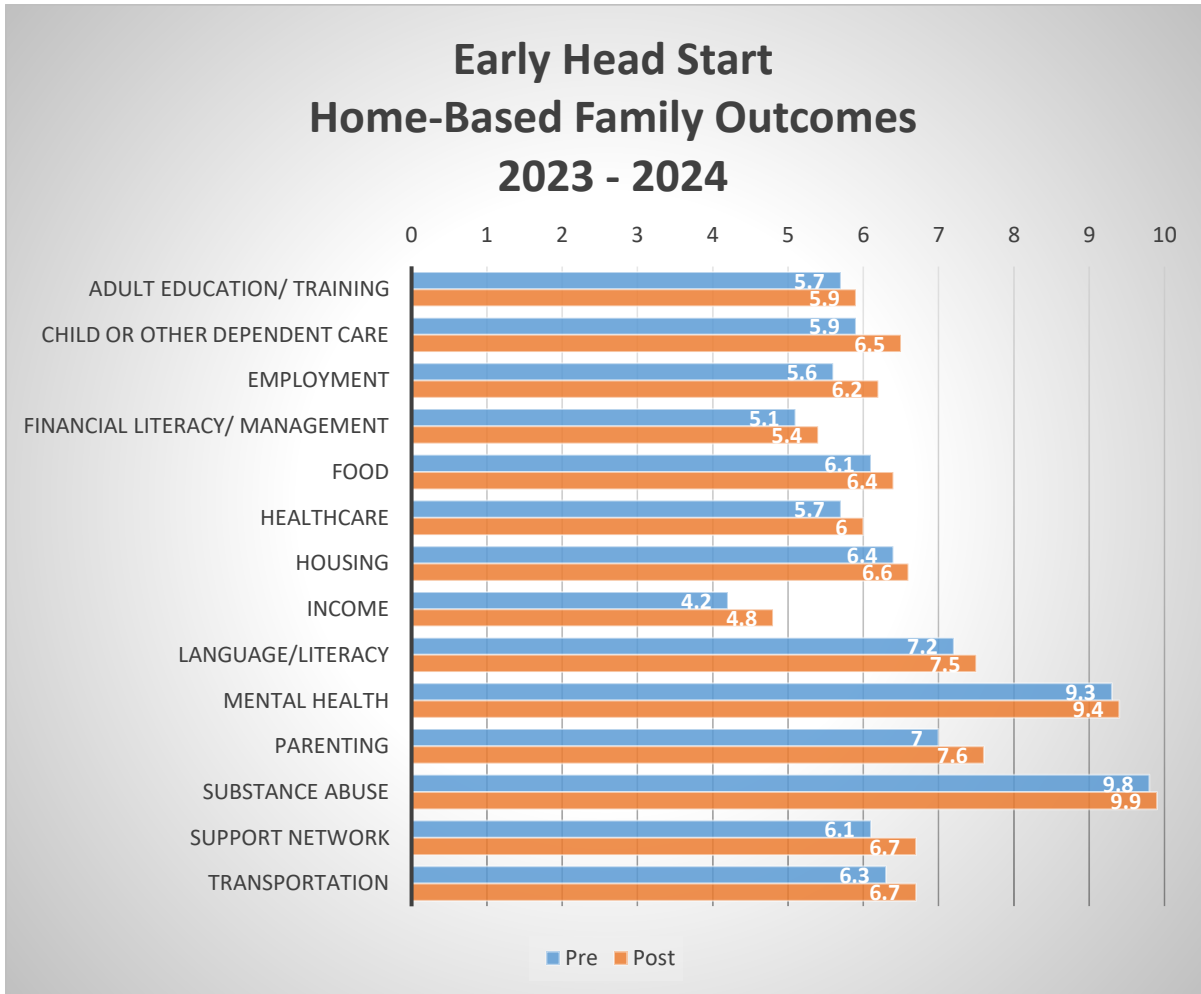
3 - 4 = Vulnerable

5 - 6 = Safe

7 - 8 = Stable

9 - 10 = Thriving

ATTACHMENT E



A family's vulnerable areas are assessed during the initial application process (Pre) and reassessed within 30 days of the end of the program year (Post).

0 - 2 = In Crisis

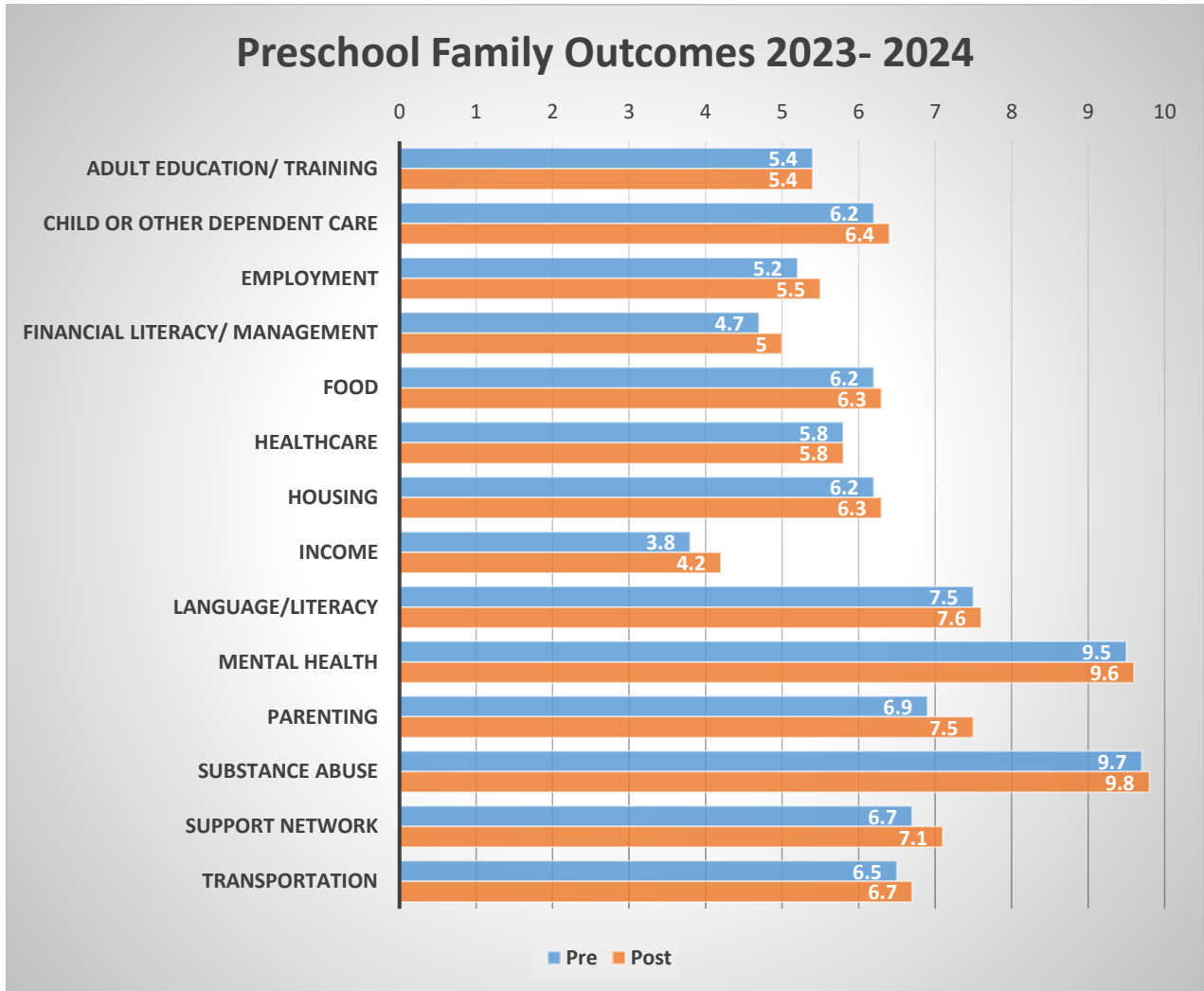
3 - 4 = Vulnerable

5 - 6 = Safe

7 - 8 = Stable

9 - 10 = Thriving

ATTACHMENT F



A family’s vulnerable areas are assessed during the initial application process (Pre) and reassessed within 30 days of the end of the program year (Post).

0 - 2 = In Crisis

3 - 4 = Vulnerable

5 - 6 = Safe

7 - 8 = Stable

9 - 10 = Thriving

ATTACHMENT G

Head Start Birth to Five Program Information Report 2023–2024

	Grantee	AZ	National
Enrollment			
Funded Enrollment	3,451	17,284	773,370
Total Enrollment (including children who withdrew)	2,656	16,505	791,455
• Home-Based/ Child Care Partners	390	5,382	235,493
• Preschool	2,266	11,780	555,962
Children enrolled less than 45 days	137	838	32,174
Dropped out and did not return	543	2,941	149,008
Children experiencing homelessness	39	1,050	58,169
Children in foster care	50	570	25,277
Children who turned three years old and aged out of the program	103	407	31,137
Of the children who turned three years old, they. . .			
• enrolled in Head Start	32	187	20,226
• enrolled in another early childhood program	55	134	6,215
• did not enroll in another early childhood program	16	86	4,313
Medical			
Children with health insurance at year-end	2,542	15,658	757,203
Children with continuous accessible health care at year-end	2,596	15,351	752,776
Children who are up-to-date on well-child exams	2,028	11,821	571,221
Children with up-to-date immunizations	1,118	12,168	640,682
Children needing medical treatment	451	2,544	97,168
Children receiving medical treatment	372	1,679	70,689
Children with a BMI over 85% (overweight/obese)	730	3,913	169,296
Dental			
Children with continuous accessible dental care at year-end	2,444	14,842	687,067
Children who received preventive dental care	1,554	10,514	516,662
Children who completed a professional dental exam	1,456	10,290	523,968
Children who need dental treatment	255	1,775	63,524
Children who received dental treatment	187	1,292	38,258
Mental Health			
Number of teachers and home visitors that received mental health consultations	112	547	37,694
Families that received mental health services	550	2,110	101,924

	Grantee	AZ	National
Disabilities			
Children with an identified disability	272	1781	117,212
Children enrolled with an Individual Family Service Plan(IFSP)/Individualized Education Plan(IEP) in place	149	961	67,307
Children who qualified for an Individual Family Service Plan/Individualized Education Plan during the school year	123	820	49,905
Preschool children with eligibility of Speech/Language Impairment	122	736	37,150
Preschool children with eligibility of Developmental Delay	107	543	26,592
Children with an IEP or IFSP and who did not receive services during the year	7	25	1,909
Families			
The total number of families served	2,524	15,131	729,912
Two parent families	1,280	7,667	295,181
One parent families	1,244	7,464	434,731
Children being raised by grandparents	29	479	14,525
Family Employment			
Families with at least one parent/guardian employed	1,876	10,861	509,796
Families with one parent in the military	15	109	5,291
Families Receiving Federal or Other Assistance			
Temporary Assistance for Needy Families (TANF)	39	483	46,122
Supplemental Security Income (SSI)	92	515	34,494
Nutrition Program for Women, Infants, and Children (WIC)	1,196	7,904	354,786
Nutrition Assistance Program (SNAP)	1,362	7,785	399,636
Family Education			
The number of in which one or more parent/guardian is job training	368	2,010	61,835
Parents with a high school diploma/GED	872	6,283	354,621
Parents with some post-secondary education	812	5,400	224,521
Family Services			
Families receiving at least one service	1,984	11,549	601,887
Top five services provided to families			
<ul style="list-style-type: none"> • Involvement in discussing their child's screening and assessment results and their progress 	1,420	8,392	477,316
<ul style="list-style-type: none"> • Supporting transitions between programs (i.e., EHS to HS, HS to kindergarten) 	947	5,835	313,953
<ul style="list-style-type: none"> • Education on the importance of nutrition 	889	6,681	342,460
<ul style="list-style-type: none"> • Education on preventive medical and oral health 	754	6,860	362,898
<ul style="list-style-type: none"> • Mental Health Services 	550	2,110	101,924
Father Engagement			
Involved in child development experiences (e.g., home visits, parent/teacher conferences, etc.)	1,180	5,989	203,410
Program governance	0	591	20,867
Parenting education workshops	543	2,276	69,694



Report

Agenda Date: 12/11/2024, Item No. 5

Head Start Birth to Five Monthly Report - October - Districts 1, 3, 4, 5, 7 and 8

This report provides the Economic Development and Housing Subcommittee, which serves as the City of Phoenix Head Start Birth to Five Governing Board, with an updated summary of the Head Start Birth to Five Program's financial and programmatic status.

THIS ITEM IS FOR INFORMATION ONLY.

Summary

The Improving Head Start for School Readiness Act of 2007 requires each Head Start Grantee to share monthly information with the Governing Board and Policy Council on program planning, policies and operations. In compliance with the Act, the Head Start program provides a monthly report on the following areas:

- Fiscal expenditures.
- Enrollment reports.
- School attendance.
- Medical/dental exams.
- Program information summaries.
- Nutrition.
- Child Incident Reports.
- Program Instructions or Information Memorandums.

Fiscal Expenditures

Attachment A shows year-to-date expenditures for the Fiscal Year 2024-25. The report includes a breakdown of each Education Service Provider, Child Care Partnership, Policy Council and the administrative support budget.

Enrollment Reports

The Office of Head Start requires programs to report the total number of children enrolled on the last day of each month. At the end of October, the total program enrollment was 2,202 out of 3,451 available slots, or 63.8 percent.

Enrollment at the end of October for the Preschool Education Service Providers was 1,943 slots filled out of 2,963, or 65.5 percent.

Early Head Start, which includes home-based and center-based year-round programming, ended the month with 259 slots filled out of 488, or 53 percent. The home-based program filled 100 out of 300 slots, or 33 percent, and the center-based program filled 159 out of 188 slots, or 84.5 percent.

Enrollment Reduction Request

On April 1, 2024, the Head Start Birth to Five Program submitted a request to reduce its enrollment by 1,242 slots. The reduction approval would bring the program to 1,957 Head Start preschool slots and 252 Early Head Start slots (64 home-based and 188 center-based), for a total of 2,209 slots. This request aims to maintain current funding levels while enhancing service delivery by offering full-day preschool classes requested by families and by increasing salaries for teachers and staff. However, the current enrollment must not exceed 2,209 slots. As of the date of this report, the Office of Head Start inquired about the number of Caseworker I positions remaining in the Early Head Start Home-Based program. The question was answered and returned within three business days. The Head Start Birth to Five Program is now awaiting the Office of Head Start's final decision on the enrollment request.

The Head Start Birth to Five Program achieved a 99.6 percent enrollment rate based on the proposed reduced number of slots, by the end of October, exceeding the target 97 percent of 2,209 slots. This success was reached through the active involvement of staff in various community events, collaboration with community partners, and through analysis of locations with vacancies.

Full Enrollment Initiative

The Full Enrollment Initiative for the Head Start Birth to Five Program concluded on April 4, 2024. On October 1, the program received a final letter from the Office of Head Start designating it as chronically under enrolled. The letter noted that, due to measurable progress towards achieving full enrollment, the Office of Head Start will not reduce the base grant for the Head Start Birth to Five Program at this time. However, any unobligated funds may be recaptured at the end of the grant period. See **Attachment B** for the Full Enrollment Initiative final letter.

Risk Assessment Notification Review

The Head Start Birth to Five program received a Risk Assessment Notification in April 2024 due to a Child Care Partner violating the Head Start Program Performance Standards, specifically the Standards of Conduct. Training and technical assistance to enhance the Birth to Five's current policies and procedures for ensuring the safety of

children has been provided through Region 9 Head Start. To date, the Birth to Five staff are on track to complete the items on the Quality Improvement Plan as scheduled. Standards of Conduct training has been completed with Education Service Provider and City staff. The Quality Assurance Monitoring team concluded the Standards of Conduct monitoring in all 135 classrooms. Initial findings suggest that instructional staff consistently adhere to the Standards of Conduct. This positive compliance reflects a commitment to maintaining a professional and respectful learning environment. A more in-depth analysis and comprehensive report will be provided in the November report.

School Attendance

The annual target for attendance set by the Office of Head Start is 85 percent.

Attachment C indicates the year-to-date average attendance through the end of October. Head Start Preschool was 57 percent, which is a four percent increase from October 2023. The Early Head Start Center-Based program was 52 percent, which is a 13 percent decrease from the same time in 2023. This reduction in attendance is due to vacant slots. Under-enrollment impacts attendance, as it is calculated on funded enrollment, not actual enrollment. Under-enrollment will be addressed with the approval of the proposed enrollment reduction by the Office of Head Start.

Medical/Dental Exams

Head Start regulations require all children to have medical and dental exams annually. At the end of October, 2,007 medical and 1,691 dental exams were completed, totaling 3,698 exams, as illustrated in **Attachment D**.

Program Information Summaries

Please see **Attachment E**.

Nutrition

Each program must design and carry out nutrition services that are culturally and developmentally appropriate and provide children with up to two-thirds of their daily nutritional requirements. Nutrition services must meet the nutritional needs and feeding requirements of each child, including children with identified food allergies, children with disabilities, and children who have special diets due to religion and family preference. In addition, a program must serve meals and snacks that meet U.S. Department of Agriculture dietary patterns and are high in nutrients and low in fat, sugar, and salt. Children in the Early Head Start Center-Based classrooms receive protein, fruits, vegetables, and low carbohydrates during breakfast and lunch with milk or water. Snacks include protein and low carbohydrates with milk or water.

Child Incident Reports

The Head Start Program Performance Standards require programs to submit reports, as appropriate, to the responsible Office of Head Start official immediately, or as soon as practicable, related to any significant incidents affecting the health and safety of the program participations. This includes injuries requiring hospitalization, emergency room treatment, or doctor's visit, as well as inappropriate discipline, potential child abuse or maltreatment, lack of supervision, or unauthorized release of a child. There was one Child Incident Report submitted to the Office of Head Start in October.

Department of Child Safety Reports

All Head Start and Early Head Start staff are required to report suspected child abuse and neglect to protect children and help children and families connect to services. During the month of October, three reports were made to the Department of Child Safety.

Program Instructions or Information Memorandums

Periodically, the Office of Head Start needs to provide information or programmatic updates to all Head Start Grantees. This is done through Program Instructions (PIs) and Information Memorandums (IMs). PIs provide information or recommendations from the U.S. Department of Health and Human Services Administration for Children and Families to States, Tribes, grantees, and others on various issues of child welfare that usually result in guidance or policy changes. IMs provide up-to-date information but do not establish requirements or supersede existing laws of official guidance.

In October, one IM and one PI was released. The IM provides guidance to support recipients in understanding the Head Start application and funding process for facilities activities; please see **Attachment F and G**. The PI provides technical updates to the final rule supporting Head Start workforce and consistent quality programming; please see **Attachment H**.

Locations

Alhambra Elementary School District, 4510 N. 37th Avenue
Cartwright Elementary School District, 5220 W. Indian School Road
Deer Valley Unified School District, 20402 N. 15th Avenue
Fowler Elementary School District, 1617 S. 67th Avenue
Isaac School District, 3348 W. McDowell Road
Laveen Elementary School District, 5601 W. Dobbins Road
Murphy Elementary School District, 3140 W. Buckeye Road
Pendergast Elementary School District, 3802 N. 91st Avenue
Phoenix Elementary School District, 1817 N. 7th Street
Riverside Elementary School District, 1414 S. 51st Avenue

Roosevelt Elementary School District, 6000 S. 7th Street
Washington Elementary School District, 4650 W. Sweetwater Avenue
Wilson Elementary School District, 3025 E. Fillmore Street
Council Districts: 1, 3, 4, 5, 7 and 8

Responsible Department

This item is submitted by Deputy City Manager Gina Montes and the Human Services Department.

Attachment A

Fiscal Expenditures Yr 1 FY 24 Head Start Financial Summary Grant 890215 Planned level of Expenditures

Fund Center	Program	FTE	Revised Budget 2024-2025	FY24 YEAR-TO- DATE Expenditures Federal Fund	FY24 Remaining Balance	FY24 YEAR-TO-DATE % Spent
8940050001	HS Administration	12	\$ 3,421,915.00	\$ 1,227,906.93	\$ 2,194,008.07	36%
8940050004	HS T&TA	-	\$ 325,611.00	\$ 39,455.51	\$ 286,155.49	12%
8940050012	HS Policy Council	-	\$ 42,262.00	7,992	\$ 34,269.52	19%
8940050015	HS Mental Health	4	\$ 549,830.00	179,262	\$ 370,568.27	33%
8940050016	HS Casework Support	67	\$ 6,637,147.00	2,069,747	\$ 4,567,400.41	31%
8940050017	HS Classroom Support	16	\$ 1,897,078.00	\$ 650,953.59	\$ 1,246,124.41	34%
	Total City of Phoenix	99	\$ 12,873,843	\$ 4,175,317	\$ 8,698,526	32%
8940051001	Alhambra	-	\$ 4,717,709	\$ 550,255	\$ 4,167,454	11.7%
8940051003	Booker T Washington	-	\$ 4,331,452	\$ 1,225,664	\$ 3,105,788	28%
8940051005	Washington	-	\$ 3,719,399	\$ 803,092	\$ 2,916,307	22%
8940051006	Deer Valley	-	\$ 1,913,945	\$ 228,548	\$ 1,685,397	12%
8940051010	Greater Phoenix Urban League	-	\$ 7,415,258	\$ 2,284,504	\$ 5,130,753	31%
8940051116	Fowler	-	\$ 1,340,478	\$ 142,390	\$ 1,198,088	11%
	Total Education Service Providers	-	\$ 23,438,240	\$ 5,234,453	\$ 18,203,787	22%
8940505021	Early Head Start Operations Support	54	\$ 6,703,424	\$ 2,624,087	\$ 4,079,337	39%
8940505024	Early Head Start T&TA	-	\$ 161,858	\$ 6,963	\$ 154,895	4%
8940505025	EHS Deer Valley		1,048,064	111,626	\$ 936,438	11%
8940505026	EHS Fowler		685,540	47,392	\$ 638,148	7%
	Total Early Head Start	54	\$ 8,598,886	\$ 2,790,067	\$ 5,808,819	32%
	Subtotal		\$ 44,910,969	\$ 12,199,837	\$ 32,711,132	27%
	Grand Total	153	44,910,969	12,199,837	32,711,132	27%



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of Head Start | 330 C St., SW, 4th Floor, Washington DC 20201 | eclkc.ohs.acf.hhs.gov

October 1, 2024

Ms. Ann O'Brien, Councilwoman, Governing Board Chair
Phoenix, City of
200 W Washington St
FI 17
Phoenix, AZ 85003-1611

Re: Grant No. 09CH012691

Dear Ms. O'Brien,

We are writing to inform you that the Office of Head Start (OHS) has designated Phoenix, City of, Grant No. 09CH012691, chronically underenrolled, pursuant to Section 641A(h)(5) of the Head Start Act. Given the measurable progress towards full enrollment, OHS will not reduce Phoenix, City of base grant at this time. However, please be advised that OHS recognizes that your agency will likely have unobligated funds at the end of the current fiscal year, and that these funds may be subject to recapture. As a reminder, you have the option to apply for a Change in Scope to reduce your funded enrollment and apply funds to other budget line items that will address under-enrollment, such as compensation for staff.

Background:

On April 12, 2023, OHS conducted an underenrollment meeting with Phoenix, City of to identify the underlying issues and challenges preventing the achievement of full enrollment in its Head Start and Early Head Start Programs. As a result of the meeting, Phoenix, City of, in collaboration with OHS, implemented a 12-month plan to achieve and maintain its funded enrollment. However, Phoenix, City of did not achieve at least 97 percent enrollment at the completion of the 12-month period.

Section 641A(h)(5)(A) of the Head Start Act authorizes OHS to review and adjust the funding and enrollment of grant recipients determined to be "chronically underenrolled." Specifically, if after receiving technical assistance and implementing a plan to correct underenrollment for a period of 12 months, a grant recipient remains enrolled at less than 97 percent of funded enrollment, the Secretary may (i) designate the grant recipient as chronically underenrolled; and (ii) recapture, withhold, or reduce the base grant for the program by a percentage equal to the percentage difference between funded enrollment and actual enrollment for the program for the most recent year for which the agency is determined to be underenrolled.

Pursuant to Section 641A(h)(5)(B) of the Head Start Act, OHS has determined that Phoenix, City of is eligible for a waiver from the recapture, withholding, or reduction of its base grant according to (ii) the shortfall can reasonably be expected to be temporary.

OHS remains committed to continuing to support Phoenix, City of in achieving and maintaining full enrollment while

maintaining the highest quality of services for children and families. Therefore, OHS will watch your program's Head Start and Early Head Start Programs enrollment for six months and continue to provide technical assistance as needed. Continued eligibility for the waiver will be re-evaluated in six months. Monthly enrollment must continue to be reported by center and program option using the Center Level Reporting Spreadsheet until further notice. Once your program is able to achieve and maintain at least 97 percent enrollment for six consecutive months, a Chronically Underenrolled Designation Removal Letter will be issued. This letter will serve as official notice that the designation of "chronically underenrolled" has been lifted.

Please be advised that the inability to achieve and maintain at least 97 percent enrollment for six consecutive months following this "chronically underenrolled" designation may result in OHS taking further action to reduce Phoenix, City of's base grant and funded enrollment pursuant to Section 641A(h)(5) of the Head Start Act.

Please contact your Regional Office if there are any questions or concerns. Thank you for all that you do on behalf of children and families.

For more information about the chronically underenrolled designation, please see [ACF-PI-HS-18-04](#).

Sincerely,

/ Heather Wanderski/

Heather Wanderski
Director, Division of Program Operations
Office of Head Start
Administration for Children and Families

ATTACHMENT A

Sec. 641A Standards; Monitoring of Head Start Agencies and Programs

...

(h) Reduction of Grants and Redistribution of Funds in Cases of Underenrollment-

(1) DEFINITIONS- In this subsection:

(A) ACTUAL ENROLLMENT- The term actual enrollment' means, with respect to the program of a Head Start agency, the actual number of children enrolled in such program and reported by the agency (as required in paragraph (2)) in a given month.

(B) BASE GRANT- The term base grant' has the meaning given the term in section 640(a)(7).

(C) FUNDED ENROLLMENT- The term funded enrollment' means, with respect to the program of a Head Start agency in a fiscal year, the number of children that the agency is funded to serve through a grant for the program during such fiscal year, as indicated in the grant agreement.

(2) ENROLLMENT REPORTING REQUIREMENT- Each entity carrying out a Head Start program shall report on a monthly basis to the Secretary and the relevant Head Start agency

(A) the actual enrollment in such program; and

(B) if such actual enrollment is less than the funded enrollment, any apparent reason for such enrollment shortfall.

(3) SECRETARIAL REVIEW AND PLAN- The Secretary shall

(A) on a semiannual basis, determine which Head Start agencies are operating with an actual enrollment that is less than the funded enrollment based on not less than 4 consecutive months of data;

(B) for each such Head Start agency operating a program with an actual enrollment that is less than its funded enrollment, as determined under subparagraph (A), develop, in collaboration with such agency, a plan and timetable for reducing or eliminating underenrollment taking into consideration--

(i) the quality and extent of the outreach, recruitment, and communitywide strategic planning and needs assessment conducted by such agency;

(ii) changing demographics, mobility of populations, and the identification of new underserved low-income populations;

(iii) facilities-related issues that may impact enrollment;

(iv) the ability to provide full-working-day programs, where needed, through funds made available under this subchapter or through collaboration with entities carrying out other early childhood education and development programs, or programs with other funding sources (where available);

(v) the availability and use by families of other early childhood education and development options in the community served; and

(vi) agency management procedures that may impact enrollment; and

(C) provide timely and ongoing technical assistance to each agency described in subparagraph (B) for the purpose of assisting the Head Start agency to implement the plan described in such subparagraph.

(4) IMPLEMENTATION- Upon receipt of the technical assistance described in paragraph (3)(C), a Head Start agency shall immediately implement the plan described in paragraph (3)(B). The Secretary shall, where determined appropriate, continue to provide technical assistance to such agency.

(5) SECRETARIAL REVIEW AND ADJUSTMENT FOR CHRONIC UNDERENROLLMENT-

(A) IN GENERAL- If, after receiving technical assistance and developing and implementing the plan as described in paragraphs (3) and (4) for 12 months, a Head Start agency is operating a program with an actual enrollment that is less than 97 percent of its funded enrollment, the Secretary may--

(i) designate such agency as chronically underenrolled; and

(ii) recapture, withhold, or reduce the base grant for the program by a percentage equal to the percentage difference between funded enrollment and actual enrollment for the program for the most recent year for which the agency is determined to be underenrolled under paragraph (3)(A).

(B) WAIVER OR LIMITATION OF REDUCTIONS- The Secretary may, as appropriate, waive or reduce the percentage recapturing, withholding, or reduction otherwise required by subparagraph (A), if, after the implementation of the plan described in paragraph (3)(B), the Secretary finds that--

- (i) the causes of the enrollment shortfall, or a portion of the shortfall, are related to the agency's serving significant numbers of highly mobile children, or are other significant causes as determined by the Secretary;
- (ii) the shortfall can reasonably be expected to be temporary; or
- (iii) the number of slots allotted to the agency is small enough that underenrollment does not create a significant shortfall.

(6) REDISTRIBUTION OF FUNDS-

(A) IN GENERAL- Funds held by the Secretary as a result of recapturing, withholding, or reducing a base grant in a fiscal year shall be redistributed by the end of the following fiscal year as follows:

- (i) INDIAN HEAD START PROGRAMS- If such funds are derived from an Indian Head Start program, then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more Indian Head Start programs.
- (ii) MIGRANT AND SEASONAL HEAD START PROGRAMS- If such funds are derived from a migrant or seasonal Head Start program, then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more programs of the type from which such funds are derived.
- (iii) EARLY HEAD START PROGRAMS- If such funds are derived from an Early Head Start program in a State, then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more Early Head Start programs in that State. If such funds are derived from an Indian Early Head Start program, then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more Indian Early Head Start programs.
- (iv) OTHER HEAD START PROGRAMS- If such funds are derived from a Head Start program in a State (excluding programs described in clauses (i) through (iii)), then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more Head Start programs (excluding programs described in clauses (i) through (iii)) that are carried out in such State.

(B) ADJUSTMENT TO FUNDED ENROLLMENT- The Secretary shall adjust as necessary the requirements relating to funded enrollment indicated in the grant agreement of a Head Start agency receiving redistributed funds under this paragraph.

ATTACHMENT C

Percentage of Preschool Attendance		
Target: 85%	YTD Percent:	57%

Goal:

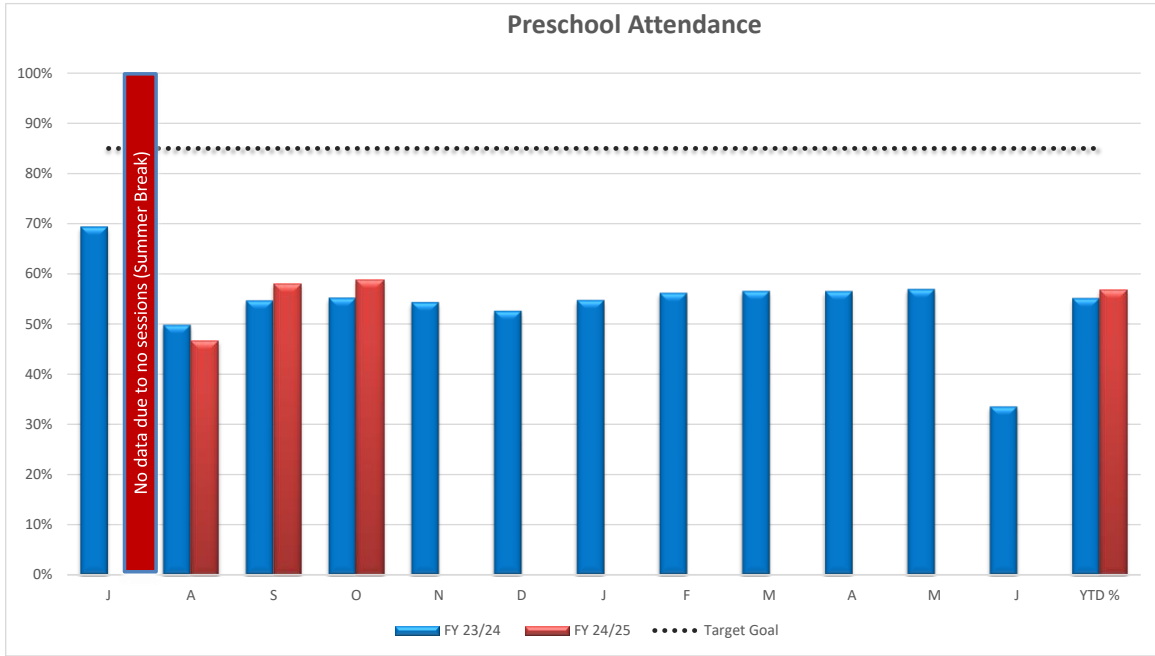
Increase attendance of Head Start Birth to Five children.

Target:

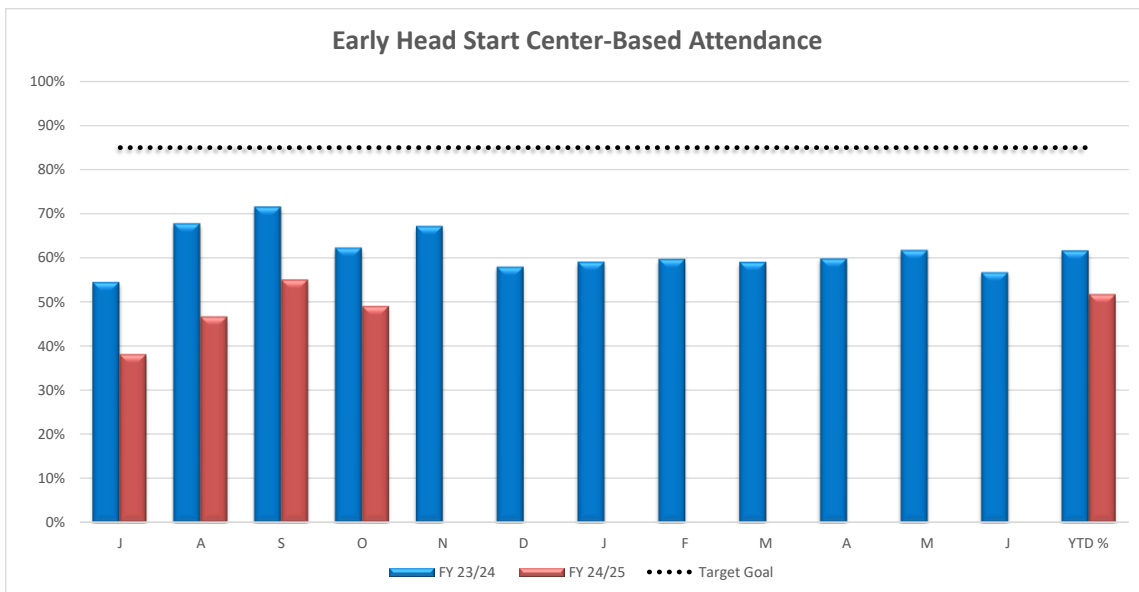
85% of children will attend each day.

Significance:

Attendance is a key factor in being able to get children ready to attend kindergarten.



Percentage of Child Care Partnership Attendance		
Target: 85%	YTD Percent:	52%



ATTACHMENT D

Head Start Birth to Five Medical Exams Completed

Target: 3,451 exams

FY 24-25 Medical Exams:

2,007

Goal:

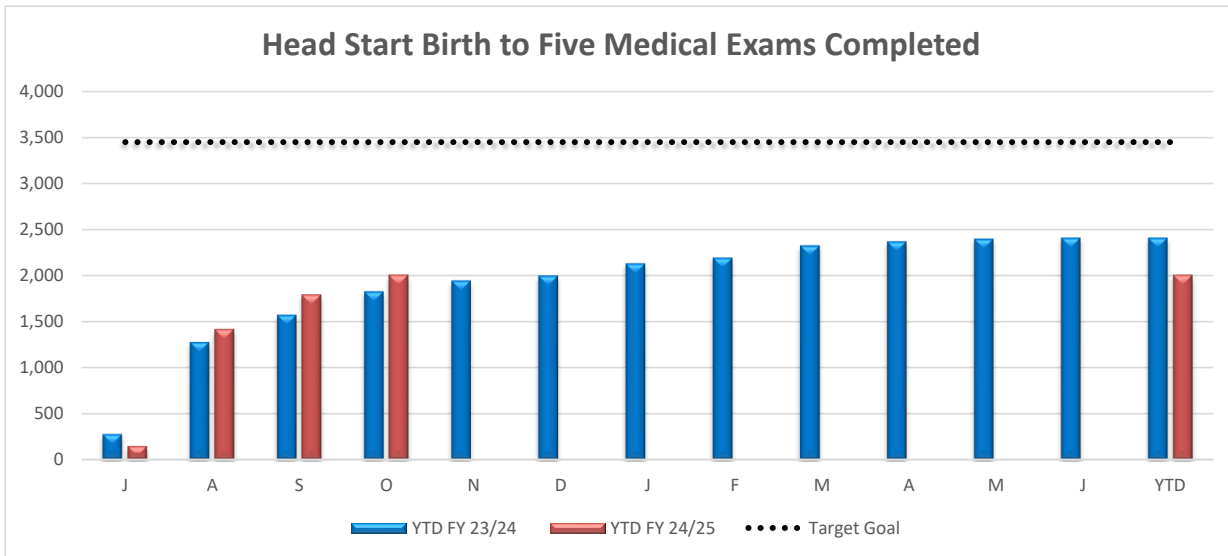
Ensure Head Start Birth to Five children receive necessary medical and dental exams.

Target:

3,451 Medical Exams and 3,451 Dental Exams

Significance:

Head Start Birth to Five children are required to have medical and dental exams as part of the Head Start regulations.

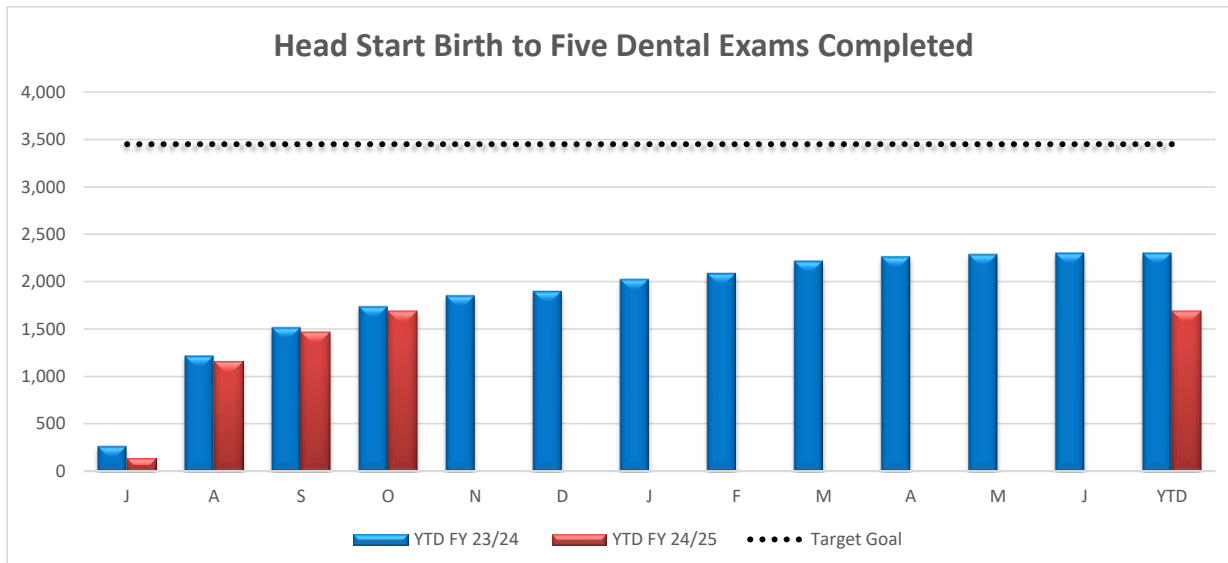


Head Start Birth to Five Dental Exams Completed

Target: 3,451 exams

FY 24-25 Dental Exams:

1,691



ATTACHMENT E

Program Information Summaries

Early Head Start Parent Education

On October 17, the interns from the Arizona College of Nursing conducted a parent education session on asthma for 10 Early Head Start families at Out of This World Christian Childcare. The presentation included information on common symptoms, steps to take during an asthma attack, and various treatment options. It was offered both in person and virtually, and the session was recorded for families who were unable to attend or who wished to review the material later. Additionally, the interns created informative handouts on safe sleep practices and febrile seizures for the parents.

Recruitment Events

In October, the Head Start Birth to Five staff actively engaged the community by hosting information tables at several key events:

- October 18, Desert West Park Halloween Monster Bash proudly sponsored by Molina Health Care, PHX Plays, and the City of Phoenix Desert West Community Center.
- October 19, Central City South AZ GAIN Involved Neighborhoods with sponsorship from AZ GAIN Involved Neighborhoods and PHX Revitalization.
- October 19, Washington Community Center Family Freight Night. Sponsored by District 5, Neighborhood Services Department, Washington Park Neighborhood, and PHX Plays.
- October 25, Mountain Park Health Center Trunk or Treat at the Baseline Clinic.
- October 26, City of Phoenix Parks and Recreation Department Boo Fest at Paseo Highlands Park.

Annual Policy Council Recognition

On October 21, members of the Head Start Birth to Five Policy Council gathered at City Hall in Assembly Rooms A and B for an end-of-term celebration. Over 20 members attended the event, where they were honored with remarks from Mayor Gallego, Councilwomen O'Brien and Hodge-Washington, Councilman Robinson, and Human Services Director Jacqueline Edwards. Each speaker expressed gratitude for the members' service and dedication to the Head Start program. All attendees received a plaque in recognition of their contributions to the Policy Council.



Facilities Guidance | ECLKC

eclkc.ohs.acf.hhs.gov/policy/im/acf-ohs-im-24-04

Facilities Guidance ACF-OHS-IM-24-04

U.S. Department
of Health and Human Services

ACF
Administration for Children and Families

- 1. Log Number:** ACF-OHS-IM-24-04
- 2. Issuance Date:** 10/21/2024
- 3. Originating Office:** Office of Head Start
- 4. Key Words:** Facilities; Depreciation; Real Property

Information Memorandum

To: Head Start Grant Recipients and Delegate Agencies

Subject: Facilities Guidance

Information:

The Office of Head Start (OHS) is committed to the provision of services in high-quality [facilities](#) with safe indoor and outdoor learning environments. This Information Memorandum (IM) is intended to support recipients in understanding the Head Start application and funding process for facilities activities. OHS is providing this guidance based on the [recently revised Head Start Program Performance Standards](#) (the Performance Standards) published on August 21, 2024.

This IM supersedes ACF-IM-HS-17-01.

Thank you for your work on behalf of Head Start children and families.

Sincerely,

/ Khari M. Garvin /

Khari M. Garvin
Director
Office of Head Start

See Attachments:

[Facilities Guidance Attachment](#)

See PDF Version of Information Memorandum:

[Facilities Guidance](#) (56.17 KB)

Historical Document

ATTACHMENT G

Facilities Guidance Attachment

ACF-OHS-IM-24-04

The Office of Head Start (OHS) is committed to the provision of child development services in high-quality facilities with safe indoor and outdoor learning environments. This Information Memorandum (IM) is intended to support recipients in understanding the Head Start application and funding process for facilities activities. OHS is providing this guidance based on the [recently revised Head Start Program Performance Standards](#) (the Performance Standards) published on August 21, 2024.

This IM attachment supersedes ACF-IM-HS-17-01.

Head Start grant funds in approved budgets may be used for the payment of rent under operating leases and for repairs and minor renovations to facilities. The use of grant funds to make payments under a capital lease, as noted in [45 CFR §75.465\(c\)\(5\)](#) and defined by Generally Accepted Accounting Principles (GAAP), must either be limited to the amount that would be allowed if the nonfederal entity purchased the property on the date the lease agreement was executed or, if the recipient will acquire title under capital lease, approved in accordance with [45 CFR §§1303.44 and 1303.45](#).

Other facilities activities using Head Start grant funds, including purchase, construction, and major renovations, require a separate application for funding ([45 CFR §§1303.44–45](#)).

The term "Head Start" is used inclusively for Head Start Preschool, Early Head Start, Early Head Start-Child Care Partnerships, Migrant and Seasonal Head Start, and American Indian and Alaska Native programs. Find definitions of other important terms and phrases used throughout this IM and the Performance Standards at [Terms, 45 CFR §1305.2](#).

Regulations applicable to [facilities](#) activities funded by OHS are found primarily at:

- [Facilities, 45 CFR §1303 Subpart E](#) of the Performance Standards
- [Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Health and Human Services \(HHS\) Awards](#) (the Uniform Guidance)
- [HHS Grants Policy Statement \(GPS\)](#), including subsequent [revisions or amendments](#)

Additional guidance is available below and on the [Head Start website](#).

Availability of Funds

Recipients are required to submit one-time funding applications for facilities activities beyond the scope of those that are part of a program's approved budget. This ensures OHS can fully understand real property needs. However, the availability of these funds is often limited and OHS typically cannot fund all requests for facilities activities.

Requests for facilities funding are subject to funding availability and priorities established by OHS and reflected in notices of funding opportunity.

Planning

Recipients are encouraged to engage in careful planning to ensure proposed facility activities address identified health and safety issues, reflect the results of a community assessment, and are eligible for funding under [45 CFR §1303.42](#). Guidance and other materials to support planning for real property activities are available on [the Head Start website](#).

Recipients may submit a written request for funding under [45 CFR §1303.43](#) for reasonable fees and costs necessary to submit an application under 45 CFR §§1303.42 and [1303.44](#). Once HHS approval is granted to use federal funds for the following and related preliminary activities, the funds are allowable regardless of the outcome of the preliminary eligibility:

- Feasibility studies
- Title commitment or title search
- Cost estimates
- Initial indoor and outdoor environmental testing to ensure suitability of the facility project being considered

It is strongly recommended that recipients discuss facilities projects with their regional program specialist and grants management specialist well before submitting a full application under 45 CFR §§1303.44 and [1303.45](#).

Applications

Recipients may submit an application to the Head Start Enterprise System (HSES) to use Head Start funds to [purchase](#) or [construct](#) facilities, and for [major renovation](#) of facilities owned by the recipient or leased from a third party.

Applications for facilities funding require the use of the [SF-429 Real Property Status Report](#) with attachment SF-429-B Request to Acquire, Improve, or Furnish. Additional information needed to meet the requirements of 45 CFR §§1303.44 and 1303.45 must accompany the SF-429 and SF-429-B forms.

Note that while a separate supplemental application is needed when requesting additional federal funds, an additional 1303 application is not required for [repairs](#) or [minor renovations](#). However, such activities may require prior written ACF approval if they meet the conditions of [45 CFR §75.308](#). An example is a kitchen repair that includes the purchase of equipment for which prior written approval is required by 45 CFR §75.308(c)(1)(xi).

Federal Interests

A [federal interest](#) in real property is created when a recipient uses Head Start or other federal funds to purchase or construct [real property](#) or conduct major renovations on leased or owned

property. Protection of the federal interest is required by the Performance Standards, [45 CFR §75.323](#) of the Uniform Guidance, and GPS. The federal interest includes:

- Total project costs paid with federal funds
- Those amounts awarded directly from OHS
- Amounts claimed by the recipient as cost sharing or matching for the project

Following a grant competition, recipients need to be prepared to assume responsibility for facilities with federal interest.

Recipients are required to file a notice of federal interest in the official real property records for the jurisdiction where the real property is or will be located, except modular units ([45 CFR §1303.46\(b\)\(1–3\)](#)). Notices of federal interest for modular units must be posted on the units ([45 CFR §1303.46\(b\)\(4\)](#); [45 CFR §75.323](#)). The Performance Standards at [45 CFR §§1303.46–49](#) detail requirements for timing, content, where to file or post notices of federal interest, and instructions for submitting copies of filed or posted notices. A federal interest cannot be defeated by a recipient’s failure to file a required notice of federal interest ([45 CFR §1303.46\(a\)](#)).

If a grant recipient receives federal funds to purchase, construct, or renovate a facility on leased property or land, the lease or other occupancy agreement must be ([45 CFR §1303.50](#)):

- At least 30 years for purchase or construction of a facility
- At least 15 years for a major renovation or placement of a modular unit

Lease or occupancy agreements that include the language under [45 CFR §§1303.50](#) and [1303.47](#) may be recorded in the official real property records for the jurisdiction where the facility is located to serve as a notice of federal interest. Recipients are encouraged to consult their regional grants management specialist and program specialist to assure the lease contains the required terms and conditions.

Repairs, Minor Renovations, and Major Renovations

Recipients should familiarize themselves with the definitions of these terms in [45 CFR §1305.2](#).

Repairs and minor renovations, as defined, do not result in a federal interest or require the filing of a notice of federal interest. Major renovations require full compliance with [45 CFR §1303 Subpart E](#). While not common, a recipient may engage in a collective group of renovation activities in a single facility — the aggregate value of which exceeds \$350,000, or higher to match any additional increases made to the simplified acquisition threshold — to address a specific part or feature of a facility.

If a recipient intends to spend more than \$350,000 (or higher to match any additional increases made to the simplified acquisition threshold) for a major renovation or a collective group of renovation activities, the recipient must submit to ACF — before starting the proposed repairs — a certification from a licensed, independent architect or engineer. The certification must indicate that the expenditures identified as repairs do not add significant value to the real property to be

repaired or extend its useful life. If it is not provided, the activity will be classified as a major renovation and compliance with 45 CFR §1303 Subpart E is required.

Head Start Act [Sec. 644\(g\)\(3\)](#) applies the [Davis-Bacon and Related Acts](#) to contractors and subcontractors engaged in covered Head Start facility construction and renovation activities in excess of \$2,000. Covered Davis-Bacon Act activities are construction, alteration, or repairs including painting or decorating. If more than \$2,000 of Head Start funds are used toward the cost of covered activities, the Davis-Bacon Act applies. Recipients engaging in facilities activities of any type should familiarize themselves with the [requirements](#) of the Davis-Bacon Act to assure compliance.

Financing, Refinancing, and Pledges of Collateral

Prior ACF approval is required in all circumstances where real property subject to a federal interest is pledged as collateral ([45 CFR §1303.48\(a\)](#)). Such circumstances include mortgages, refinancing of existing facilities debt, and general or “blanket” pledges of collateral. Recipients requesting prior approval to use property subject to a federal interest as collateral must submit [SF-429 Real Property Status Report](#) and attachment SF-429-C Disposition or Encumbrance Request.

The Performance Standards require that loan agreements with third-party lenders for property subject to a federal interest contain language providing ACF with certain rights, as described in [45 CFR §1303.49\(a\)\(1–7\)](#). These include:

- Notice of any borrower default in payment or performance
- An opportunity to cure the default
- The right to direct assignment of the loan to another recipient

Recipients are also required to immediately notify ACF of any default in a loan agreement secured by property subject to a federal interest ([45 CFR §1303.49\(b\)](#)). Recipients who successfully compete for a new service area may be required by OHS to accept facilities or assignment of loans associated with facilities continuing in Head Start use.

Recipients should be aware that loans with short-term maturity dates of less than 15 years (interest-only) will not generally be approved by ACF. A capital lease resulting in acquisition of title to real property requires prior ACF approval. It will only be considered in those rare instances where the recipient acquires title to the property but the cost of title acquisition under the capital lease does not exceed the value of the property at the time the capital lease is or was entered into.

As noted below, absent prior ACF approval of a capital lease, rental costs under leases that are required to be treated as capital leases under GAAP are allowable only up to the amount that would be allowed had the nonfederal entity purchased the property on the date the lease agreement was executed. [45 CFR §75.465\(c\)\(5\)](#).

Subordination Agreements

A subordination agreement is a legal contract between ACF and a lender that allows the lender to establish first lien status on property already subject to a federal interest. Only ACF can agree to a subordination of the federal interest to the rights of a lender. Common situations where subordination agreements are requested include:

- Use of Head Start funds as a down payment with an accompanying mortgage for the balance of the purchase price
- When property subject to an existing mortgage is refinanced after acquisition

Recipients requesting a subordination agreement from ACF must submit SF-429 Real Property Status Report and attachment SF-429-C.

When the amount of federal funds already contributed to the facility prior to the subordination exceeds the amount to be provided by the lender seeking subordination, [45 CFR §1303.51](#) requires the recipient to show that funding is not available without subordination of the federal interest. This could be shown, for example, by a letter from the proposed lender stating that it will not fund the proposed loan without subordination of the federal interest.

Recipients are encouraged to consult their regional grants management specialist prior to submitting a subordination request. This will ensure that the proposed subordination agreement includes all required terms and conditions, and that all supporting materials (e.g., an independent appraisal of the current value of property at issue and proposed loan documents) are completed and available to accompany the subordination request.

Leases

Facility leases are classified for accounting purposes as either operating or capital leases. To determine allowable costs, property subject to a capital lease is treated as though it were owned by the recipient ([45 CFR §75.465\(c\)\(5\)](#)), while the reasonable costs of operating leases are ongoing operating expenses. Capital leases resulting in the acquisition of title by the lessee (recipient) are sometimes referred to as lease-purchase agreements.

Sale and leaseback agreements are treated similarly to capital leases ([45 CFR §75.465\(c\)](#)). If a recipient is party to a less-than-arms-length lease as described in [45 CFR §75.465\(c\)\(1–4\)](#), charges against the Head Start award are also limited in accordance with [45 CFR §75.436](#).

Rental costs under capital leases (except where previously approved in writing by ACF as a purchase), sale and leaseback agreements, and less-than-arms-length lease arrangements are allowable only up to the amount that would be allowed had the recipient owned the leased property. This amount includes expenses such as depreciation, maintenance, taxes (if the recipient is not exempt), and insurance ([45 CFR §75.436](#)).

Depreciation

Recipients may charge their Head Start award for allocable and allowable depreciation of recipient-owned facilities used for Head Start program purposes ([45 CFR §75.436](#)). Allowable annual depreciation is generally the acquisition cost of a facility (excluding land) divided by the useful life of the facility as established in the recipient's financial statements.

Depreciation must be adjusted (allocated) to reflect the extent of Head Start usage of the facility. It cannot include any portion of the cost of the facility (acquisition or major renovation) acquired through the use of or claimed as nonfederal match for Head Start funds (45 CFR §75.436(b-d)). For example, if the acquisition cost of a recipient-owned facility, excluding land, is \$800,000 and its useful life is 40 years, allowable annual depreciation is \$20,000 per year if the facility is used 100% for Head Start purposes and no federal funds or nonfederal match have contributed to the acquisition cost of the facility.

Scenario 1: If only 60% of the facility is used for Head Start services, the amount of annual allowable depreciation noted above must be reduced to 60% of the otherwise allowable amount, resulting in depreciation of \$12,000.

Scenario 2: If 30% of the cost of the facility was paid with Head Start funds, 30% of the amount of annual allowable depreciation noted above must be deducted, leaving 70% of the otherwise allowable amount or \$14,000.

Scenarios 1 and 2 combined: If only 60% of the facility is used for Head Start purposes and 30% the cost of the facility was paid with Head Start funds, the amount of annual allowable depreciation noted above must be adjusted for both extent of Head Start use and federal share.

- Step 1: Adjustment for Head Start usage at 60% = \$12,000.
- Step 2: A further 30% reduction of the amount arrived at in Step 1 (70% x \$12,000) produces final allowable depreciation in the amount of \$8,400.

Charges for depreciation must be supported by adequate depreciation and property records, and physical inventories must be taken at least once every two years (45 CFR § 75.436(e)). Allowable amounts of annual depreciation may be charged against the recipient's Head Start award or claimed as nonfederal match if the recipient foregoes the charging of otherwise allowable depreciation.

Reporting and Recordkeeping

All recipients are required to complete and submit real property status information annually using the [SF-429 Real Property Status Report](#), including attachment SF-429-A General Reporting. Additional information must be reported for each piece of property in which a [federal interest](#) exists, even if the recipient has not filed or posted the required notice of federal interest ([45 CFR §1303.46\(a\)](#)).

Recipients must retain records pertinent to the lease, purchase, construction, or renovation of a facility funded in whole or in part with Head Start funds for as long as the recipient owns or

occupies the facility, plus three years ([45 CFR §1303.54](#)). In the circumstances identified in [45 CFR §75.361\(a–f\)](#), record retention may be required for periods in excess of three years. If a recipient is charging depreciation to its Head Start award, those charges must be supported by adequate property records supporting acquisition cost and useful life, and physical inventories must be taken at least once every two years ([45 CFR §75.436\(e\)](#)).

Valuation and Matching

The determination of value must be made by an independent real property appraiser certified or licensed in the state where the property is located ([45 CFR §75.306\(i\)\(1\)](#)). The appraiser must be licensed for the type of property appraised, generally commercial real estate. An appraisal more than three years old cannot be used to establish the current value of real property. The appraisal can be conducted on-site or virtually ([45 CFR §1303.44\(a\)\(7\)](#)).

Fair market rental value is the amount that a recipient would have to pay to rent comparable space in the community. The claimed value of donated space must not exceed the fair market rental value of comparable space, as established by an independent appraisal of comparable space in a privately-owned building in the same locality ([45 CFR §75.306\(i\)\(3\)](#)).

To establish fair market rental value of donated space from an unrelated party, the required fair market rental value may be established by an appraiser as described above, or by a licensed and independent real estate broker or agent familiar with the rental market in the local community. An appraisal more than three years old cannot be used to establish current fair market rental value of donated space.

If space is donated by a related party, the amount of matching the recipient may claim is limited to the amount that could have been claimed had the recipient been the titleholder of the property. The matching is generally those amounts described in [45 CFR §75.436](#).

Disposition

When real property subject to a federal interest is no longer needed for program purposes ([45 CFR §75.318\(b\)](#)), recipients must request that ACF provide disposition instructions for the property ([45 CFR §75.318\(b–c\)](#)). Disposition requests are made using [SF-429 Real Property Status Report](#) and attachment SF-429-C Disposition or Encumbrance Request.

ACF may also instruct a recipient to dispose of real property if the recipient is no longer funded to provide services in the area in which the real property is located. This may occur when a recipient relinquishes its Head Start award, is de-funded by OHS, or does not retain the service area as a result of designation renewal competition.

A recipient may request that real property subject to a federal interest be used in another federally sponsored program offered by the recipient with a purpose similar to Head Start programs ([45 CFR §75.318\(b\)\(2\)](#)). If use in another program is not possible or not approved, ACF may direct the recipient to undertake one of three disposition options.

1. The recipient may be instructed to retain the property title subject to a federal interest and compensate ACF for the value of the federal interest in the property (45 CFR §75.318(c)(1)).
2. ACF may direct the recipient to sell the property, allocating the proceeds between ACF and the recipient based on their relative interests in the property (45 CFR §75.318(c)(2)).
3. The recipient may be directed to transfer the property title to a third party with compensation for the value of the recipient's share of the property (45 CFR §75.318(c)(3)).

With prior ACF approval, 45 CFR §75.318(c)(1) allows the recipient to use the net proceeds of the sale of property subject to a federal interest to offset the cost of replacement property acquired under the same federal award. Since the option of using sale proceeds to offset the cost of replacement property did not uniformly exist under regulations applicable prior to December 26, 2014, recipients proposing to use sale proceeds to acquire replacement property must formally adopt the Uniform Guidance for all of their existing facilities awards. This requirement is reflected in the recipient's fiscal policies and procedures and approved by their governing body and Policy Council.

Recipients may indicate their use or disposition preference on the disposition request. However, ACF has the discretion to instruct a recipient to engage in another method of disposition which may better suit program needs. If a disposition instruction requires compensation by ACF of a recipient's share in real property, the recipient must provide documentation of the source, amount and any restrictions or condition associated with funding for any claimed recipient share. Costs of purchase, construction, or major renovations to the property previously claimed by the recipient as cost sharing or match to the Head Start award are part of the [federal interest](#). Failure to comply with disposition instructions issued by ACF may result in denial of close-out funding or adverse action against the recipient.

To determine the current value of the federal interest and recipient share in connection with disposition of real property, current fair market value must be established by an independent real property appraiser certified or licensed in the state where the property is located (GPS). Once current fair market value is established, the value of the federal interest and recipient equity, and other third-party interest or equity if applicable, are determined by calculating the respective federal, recipient, and any third-party contributions to the property. The resulting percentages are applied to the current fair market value.

All claim amounts included in the calculation of recipient contribution must be adequately documented. They cannot include funds or property subject to a third-party use restriction, reversionary interest, encumbrance, or similar condition. In the event of disposition requiring ACF compensation of recipient share, it is the responsibility of the recipient to produce adequate documentation to establish recipient equity upon receipt of disposition instructions.

If it is necessary to establish federal interest and recipient equity in connection with a disposition, recipients are encouraged to work closely with their regional program specialist and grants management specialist throughout the disposition process.

Conclusion

Using Head Start funds to purchase, construct, and majorly renovate real property provides an important opportunity for recipients. It's a way to ensure that services to children and families are provided in high-quality facilities that support school readiness and enhance the delivery of those comprehensive services. Real property activities funded by OHS represent significant investments intended to benefit children and families in the local community over extended periods of time.

Although recipients are permitted to hold title to real property acquired or improved with OHS funds, the property is held in trust by the recipient as trustee for the beneficiaries of the project or program under which the property was acquired or improved ([45 CFR §75.323](#)). Compliance with the requirements of [45 CFR Part 1303 Subpart E](#) and [45 CFR Part 75](#) is mandatory to ensure ongoing availability of real property for program use. The requirements also protect the recipient from future risk of audit issues, monitoring findings, and potential disallowance of previously awarded funds.

Recipients considering real property activities covered by the Performance Standards, Uniform Guidance, and Grants Policy Statement are encouraged to consult their program specialist and grants management specialist early in the project development process to ensure compliance with all requirements that apply to real property activities funded by OHS.



Final Rule on Supporting the Head Start Workforce and Consistent Quality Programming – Technical Updates

eclkc.ohs.acf.hhs.gov/policy/pi/acf-ohs-pi-24-06

Final Rule on Supporting the Head Start Workforce and Consistent Quality Programming – Technical Updates ACF-OHS-PI-24-06

U.S. Department
of Health and Human Services

ACF
Administration for Children and Families

1. **Log Number:** ACF-OHS-PI-24-06
2. **Issuance Date:** 10/31/2024
3. **Originating Office:** Office of Head Start
4. **Key Words:** Head Start Workforce; Wages; Benefits; Mental Health; Quality Improvement

Program Instruction

To: All Head Start Preschool and Early Head Start Grant Recipients

Subject: Final Rule on Supporting the Head Start Workforce and Consistent Quality Programming – Technical Updates

Instruction:

On August 21, 2024, the Administration for Children and Families (ACF) published a final rule in the Federal Register, [Supporting the Head Start Workforce and Consistent Quality Programming](#). The rule updates the Head Start Program Performance Standards (the Performance Standards) to increase support and stability for the Head Start workforce. The changes also improve the quality of services Head Start programs provide to children and families.

This Program Instruction (PI) notes a few technical updates to [ACF-OHS-PI-24-05](#), which summarizes the final rule and outlines changes to the Performance Standards. These technical updates are minor

corrections for typographic errors or omissions that do not substantively change the policies described in the final rule.

First, this PI clarifies that the final rule effective date was incorrectly listed as the date of publication, August 21, 2024. The effective date should have been October 21, 2024, to comply with the 60-day delay required by the Congressional Review Act.

The notification regarding the effective date does not change any of the compliance dates specified in the rule. Grant recipients may still implement new flexibilities starting from the date of publication, August 21, 2024. This includes the provision that allows programs to adjust a family’s gross income to account for excessive housing costs for the purposes of determining eligibility for Head Start services ([45 CFR §1302.12\(i\)\(1\)\(ii\)](#)), as well as those related to qualification requirements for mental health consultants ([45 CFR §1302.91\(e\)\(8\)\(ii\)](#)) and the annual update to the community assessment ([45 CFR §1302.11\(b\)\(5\)](#)). Programs were able to start using this flexibility from the beginning of the current 2024–2025 program year and this remains unchanged.

This PI also notes two other technical updates to the regulatory text. The final rule inadvertently included an incorrect citation in the requirements for family partnership services, and left out the August 1, 2028, compliance date for staff benefit requirements. A formal correction for both of these issues was published in the [Federal Register](#) on October 31, 2024.

OHS will continue to provide [direction, guidance, and resources](#) that support Head Start programs to understand and implement changes to the Performance Standards.

Thank you for the work you do on behalf of children and families.

Sincerely,

/ Khari M. Garvin /

Khari M. Garvin
Director
Office of Head Start

See PDF Version of Program Instruction:

[Final Rule on Supporting the Head Start Workforce and Consistent Quality Programming – Technical Updates](#) (22.16 KB)

Historical Document



Report

Agenda Date: 12/11/2024, Item No. 6

Bloomberg Workforce Update

This report provides an update on workforce development initiatives that the Community and Economic Development Department partners on with Bloomberg Associates.

THIS ITEM IS FOR INFORMATION AND DISCUSSION.

Summary

In 2021, Phoenix's Mobile Career Unit (MCU) project was selected by Bloomberg Philanthropies' Global Mayors Challenge, initiating a multi-year partnership with Bloomberg Associates (BA). This collaboration provides expert consulting to support Phoenix's workforce and economic development initiatives.

Since 2022, the Community and Economic Development Department's (CEDD) has worked closely with Bloomberg Associates to develop a comprehensive three-year strategy and implementation plan for the Phoenix Business and Workforce Development Board (Board). BA has supported CEDD in engaging employers and training providers, integrating global best practices into Phoenix's workforce services, and expanding job-seeking opportunities for residents. The workforce initiatives supported by Bloomberg Associates since 2022 include:

- **Board Strategic Plan and Implementation (2023-2026):** In July 2023, CEDD and BA collaborated with Board members and stakeholders to establish the 2023-2026 Strategic Plan and implementation roadmap. This plan outlines priority actions and strategies to achieve the Board's key objectives.
- **Enhanced Employer Engagement & Workforce Readiness Standards:** Through a collaborative employer engagement sprint, CEDD and BA worked with major employers in sectors such as insurance, semiconductors, and financial services. This initiative resulted in the creation of employer-vetted workforce readiness standards and customized training to meet industry demands.
- **Phoenix Workforce Coalition (PWC):** PWC was formed to bring together workforce providers, employers, and stakeholders to streamline workforce development and establish shared priorities, including workforce readiness standards and accessible career pathways.

- **Single Front Door for Job Seekers & Employers:** CEDD and BA developed an online portal to simplify access to workforce resources for job seekers and employers. The "Single Front Door" is expected to launch by the end of the year.
- **AI Impact on Industry Sectors:** CEDD, BA, and the Greater Phoenix Economic Council are assessing the impact of AI on key industries, identifying retraining needs, and developing skill-up pathways for affected workers.
- **Fundraising Models:** In response to Workforce Innovation and Opportunity Act funding reductions, BA is assisting CEDD in establishing a braided funding model through a 501(c)(3) nonprofit organization to diversify funding and support continued workforce services in Phoenix.
- **"Good Jobs" Standards:** Following the "Good Jobs Summer Tour" with Acting Department of Labor Secretary Julie Su, PWC is developing Phoenix-specific standards for quality jobs, informed by feedback from local employers and best practices.
- **Board Dashboard:** BA developed a dashboard to track Board projects and progress, improving communication and transparency.

Workforce Innovation and Opportunity Act (WIOA) Funding

WIOA funding is currently the primary source of support for workforce development services provided by the City of Phoenix. Over the last several years, Phoenix's WIOA allocation has decreased from \$14.2 million to \$10.2 million, limiting the Board's ability to fund services at scale. This reduction in funds has also led to scaling back existing services, even as the semiconductor ecosystem anticipates a need for up to 70,000 skilled workers to support new chip factories in Phoenix. In response to these reductions, BA has identified braided funding models to diversify workforce development funding by leveraging corporate and philanthropic sources. BA has also offered to support City staff with fundraising coaching and to facilitate connections with potential funding partners.

Fund Management Structure

Raised funds would flow through a 501(c)(3) nonprofit organization rather than directly through the City of Phoenix, a model commonly used in cities like Los Angeles and Seattle. This approach provides greater flexibility in matching funds with WIOA allocations.

CEDD has identified a potential 501(c)(3) vehicle but currently lacks the resources to hire a full-time fundraiser. Possible solutions are being explored to address this gap.

Moving forward, efforts to diversify workforce development funding is critical in addressing WIOA cuts. With guidance from BA, CEDD plans to implement a 501(c)(3)

fundraising model similar to those in other cities. Continued advocacy and assistance from City Council in exploring solutions will remain crucial to addressing funding challenges.

Responsible Department

This item is submitted by Deputy City Manager John Chan and the Community and Economic Development Department.



Report

Agenda Date: 12/11/2024, Item No. 7

Development Agreement with Biscuit Flats Dev LLC for Public Infrastructure Improvements

Request the Economic Development and Housing Subcommittee recommend City Council approval to enter into a Development Agreement (DA), and any other agreements, instruments or documents as necessary, with Biscuit Flats Dev LLC, or its City-approved designee, for the installation of public infrastructure improvements in and around a proposed development on 2,300 acres of land surrounding the Taiwan Semiconductor Manufacturing Company (TSMC) development.

THIS ITEM IS FOR DISCUSSION AND POSSIBLE ACTION.

Summary

In May 2020, TSMC announced its intention to build and operate an advanced semiconductor fabrication facility (FAB) in Phoenix. This was followed with announcements of three total Fabs with an investment totaling \$65 billion, with room for six total Fabs. In the summer of 2020 the City zoned 3,500 acres for TSMC (1,100 acres) and a Tech Park (2,300 acres). In Taiwan, TSMC is located in science and technology parks, and it has always been TSMC's vision to have the same innovative activity and amenities located around their project site. In May 2024, an Arizona State Land Department auction was held after several years of research and planning, which estimated \$1.7 billion in public infrastructure would be needed to develop the 2,300 acres. The applicant group comprised of Mack Real Estate Group and McCourt Partners entity Biscuit Flats Dev LLC (Developer) was the successful bidder on May 29, 2024.

The Developer proposes to construct a new mixed-use commercial park known as Halo Vista consisting of an estimated 12 million square feet of industrial space (The Forge), 3.5 million square feet of flex-tech/office space (Sonoran Oasis Science and Tech Park), 500,000 square feet of major destination retail, restaurant, hotels, an auto mall planned for ten dealers, residential, medical, and educational uses. Halo Vista is an important economic development opportunity that will create thousands of high-wage jobs over time and provide significant financial benefit for the City, above and beyond the sales tax revenue generated.

This area of Phoenix continues to be a high-demand, high-growth area for retail, new residential and employment uses. To accommodate for this growth, increased traffic, and the creation of the Halo Vista, significant public infrastructure improvements are required. The Developer will construct the required public infrastructure improvements, including water and wastewater lines, public streets, traffic signals, public art, enhanced landscaping and public drainage. It is anticipated that Halo Vista will generate 62,000 jobs at ultimate build-out and will be a hub of industry and research in the southwest United States, and throughout the entire country. The proposed major business terms are as follows:

- Developer shall, within three months of Council Approval ("Authorization Date"), submit complete and conceptual site master plans to the City's Planning and Development Department.
- Developer shall design and construct public streets, as mandated by the standards of the Street Transportation and Planning and Development departments, including 43rd and 51st avenues and Dove Valley Road and additional collector streets as approved by the City and respective governing jurisdictions (including landscaping, sidewalks, streetlights, public art and appurtenant amenities), for public access through the Project.
- Developer shall design and construct the public water and wastewater infrastructure as required by the City-approved master plans, and as illustrated in accordance with the approved Planned Unit Development zoning.
- Developer shall convey all rights-of-way at no cost to the City.
- Developer must comply with Title 34 of the Arizona Revised Statutes in constructing the improvements to qualify for reimbursement, and the specifics and cost of the improvements must be pre-approved by the City to qualify for reimbursement.
- Developer and its contractors shall produce documents to verify taxes paid to the City.
- City will reimburse the Developer, for the construction of approved public infrastructure improvements through the City's eligible General Fund portion of the Transaction Privilege Tax (TPT) generated by the Project. The public infrastructure improvements will be completed in a phased manner, and reimbursements will begin at the completion of the first phase of public infrastructure improvements, and the City's acceptance of the improvements and the dedication of the public

improvements to the City. The City may use other restricted fund sources for eligible approved costs in lieu of TPT reimbursements, where available.

- City will reserve 400,000 gallons of wastewater capacity for the first phase of Halo Vista.
- Additional public infrastructure and related components (and costs thereof) may be approved by the Community and Economic Development Director.

The DA will include other terms and conditions as deemed necessary by the City.

Reimbursement shall be paid on an annual basis, in arrears, from the following sources: 100 percent of the City's eligible General Fund portion of the TPT generated by the Project and collected and received by the City, and as verified by the City. City may use other restricted fund sources to reimburse Developer for eligible approved costs, at the City's sole discretion. Reimbursement shall not exceed actual verifiable costs for the approved improvements.

Contract Term

The term of the DA shall end upon the earlier of 25 years after the commencement of construction of the first phase, as made evident by the issuance of required permits (Construction Commencement Date) or upon the date Developer has received reimbursements totaling the actual approved verifiable costs..

Financial Impact

The City's financial impact will be the reimbursement of the eligible General Fund share of the TPT generated from the Project over 25 years as well as other restricted fund sources, as applicable to the improvements constructed. Financial terms of the Agreements will be provided to the Budget and Research and Finance Departments for review prior to the execution of the Agreements.

Location

Approximately 2,300 acres around TSMC, bordered by the 74 Carefree Highway to the north, I-17 Freeway to the east, Loop 303 Freeway to the south and Deadman's wash to the west

Council District: 1

Responsible Department

This item is submitted by Assistant City Manager Lori Bays, Deputy City Managers John Chan, Alan Stephenson, Ginger Spencer and Inger Erickson, and the Community

and Economic Development, Fire, Planning and Development, Street Transportation and Water Service departments.