

## ONGOING MONITORING POLICY

Policy Number: ADM 1011	Effective Date: 6/19/07	Policy Council Approval Date: 6/19/07 8/27/13	Review Date: August 27,2013
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**PERFORMANCE OBJECTIVE: 1304.51(i)(2)** Grantees must establish and implement procedures for the ongoing monitoring of their own Early Head Start and Head Start operations to ensure that these operations effectively implement Federal regulations.

### **PROCEDURES:**

1. **Responsibility** - The management of the agency is responsible for developing procedures or processes that will allow them to detect noncompliance with Federal regulations.
2. **Procedures** - These procedures will include, but will not be limited to:
  - a. Key staff will review written documents such as purchase orders, invoices, bus reports, lesson plans, meal reports, timesheets and other fiscal and program documentation.
  - b. Coordinators will visit centers/sites to make observations and conduct file reviews. Center visitation reports will be completed after the observation. Supervisors and staff will follow-up on recommendations and identified issues. Area Supervisors will prepare a written response for CVR's that have significant compliance issues.
  - c. Supervisors and coordinators will meet monthly to discuss center operations and compliance issues.
  - d. Supervisors will complete quarterly health and safety checklists.
  - e. An annual self-assessment will be completed.
  - f. The Program Information Report, child outcome information and other federal and state required outcome information will be reviewed.
3. **Corrective Action** - When non-compliance issues regarding Federal regulations are identified, the supervisor is contacted to investigate the circumstances. Depending on the situation, a wide variety of corrective actions are possible. These may include, but will not be limited to:
  - a. Coaching the employee(s) involved to improve their understanding of the requirements,
  - b. Working with the appropriate coordinator to prepare a written plan of action that will be jointly executed,
  - c. Giving a verbal or written warning to remind employee(s) of their duties,
  - d. Issuing a written reprimand to document the non-compliance and improve future performance,
  - e. Recommending to the Policy Council that the employee should be terminated based on the documentation of the incident(s).
  - f. Other actions that may be recommended by legal counsel, funding source or Governing Board as consistent with federal guidelines.

4. **Governance** - The Governing Board and Policy Council will be made aware of program performance through monthly budget and performance reports, the annual agency audit, self-assessment results and any other federal or state monitoring actions.