

**PROCEDURES FOR HEAD START / EARLY HEAD START
PROGRAM GOVERNANCE**

Pursuant to CFR Parts 1301

**HONORABLE WEBB COUNTY COMMISSIONERS' COURT AND
HEAD START POLICY COUNCIL**

**WEBB COUNTY, TEXAS
1000 HOUSTON
LAREDO, TEXAS 78040**

INTRODUCTION

Webb County, acting through its Commissioners' Court, which serves as the Governing Body for the Head Start / Early Head Start Program, has established, approved and implemented written procedures describing the roles and responsibilities of the Governing Body for governance and management and procedures describing how the Governing Body and the Policy Council will implement shared decision-making pursuant to the rules and regulations promulgated under 45 CFR 1301.1, as authorized by 42 U.S.C. 9801, *et seq.*, in order to continue to ensure that Head Start is a high quality program for children and families that are served.

The Webb County Commissioners' Court and the Head Start Policy Council are committed to working in partnership with key management staff to develop, review, and approve or disapprove the following procedures for the Head Start Program Governance.

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PROCEDURES FOR PROGRAM PLANNING

Purpose:

In accordance with 45 CFR 1302.100, our Head Start program is committed to establishing and maintaining an effective management system of ongoing monitoring and continuous improvement to achieve program goals. This system ensures *child safety* and the *delivery of high-quality, comprehensive services*.

The purpose of this policy is to establish a formal, systematic process for strategic planning in the Head Start program. This ensures alignment with the Head Start mission, continuous quality improvement, and compliance with the Head Start Program Performance Standards (HSPPS).

Scope

This policy applies to all components of the Head Start program, including education, family engagement, health and nutrition, governance, and administration, and involves all relevant stakeholders (staff, Policy Council, governing body, families, and community partners).

Regulatory Authority

- Head Start Program Performance Standards (HSPPS) require a continuous planning system, including community assessment, self-assessment, goal-setting, action plans, monitoring, evaluation, and course correction.
- Ongoing monitoring and self-assessment are required under 45 CFR § 1302.102.
- Other relevant guidance comes from Foundations for Excellence: A Guide for Five-Year Planning and Continuous Improvement.

Roles and Responsibilities

- **Program Director / Leadership Team:** Lead the strategic planning process, coordinate assessments, draft goals and action plans, report to the governing body.
- **Policy Council:** Participate in planning, approve goals and action plans, review data, and provide feedback.
- **Governing Body:** Review and approve strategic goals and action plans; ensure resources align with planning.
- **Self-Assessment Team:** Conducts the annual self-assessment and generates improvement recommendations.
- **Staff:** Participate in action plan implementation, data collection, and continuous improvement activities.
- **Community Partners / Families:** Provide input during community assessment, help set school readiness goals, participate in planning teams, and review progress.

Definitions

- **Strategic (Long-Term) Goals:** Broad, long-range priorities (e.g., over a five-year grant period) developed from community and self-assessment.
- **Objectives:** Specific, measurable statements that break down goals into actionable, time-bound pieces.
- **Action Plan:** Annual or periodic plan that outlines activities, responsible parties, timelines, resources, and measures of success.
- **Community Assessment:** A systematic review of community strengths, needs, and resources.
- **Self-Assessment:** Internal review of program operations, compliance, and progress toward goals.

1. Needs Assessment

Before planning, programs assess the **community and family needs**:

- **Community assessment:** Identify demographics, available resources, and gaps in services.
- **Family engagement:** Collect input from parents and families about their priorities and concerns.
- **Child assessment data:** Review developmental screenings, health data, and previous program outcomes.
- **Purpose:** Ensure programs are tailored to local needs and resources.

2. Program Design

After assessing needs, programs develop a **program plan** based on HSPPS requirements:

- **Education:** Define curriculum goals (cognitive, social-emotional, physical development).
- **Health:** Establish health and nutrition services, including screenings, immunizations, and medical referrals.
- **Family services:** Identify parent engagement strategies, social services support, and workforce development.
- **Disabilities services:** Plan for inclusion and Individualized Family Service Plans (IFSPs) or Individualized Education Programs (IEPs).

3. Goal Setting and Objective Development

Our program, in collaboration with the **governing body** and **Policy Council**, will establish **goals and measurable objectives** that include:

1. **Strategic Long-Term Goals** — These ensure our program remains responsive to community needs identified in our community assessment.
2. **Service Provision Goals** — Goals covering educational, health, nutritional, and family/community engagement services to promote school readiness.

3. **School Readiness Goals** — These are aligned to the Head Start Early Learning Outcomes Framework (ELOF), and as appropriate, state/tribal early learning standards or expectations of local schools.
4. **Health & Safety Goals** — Ensuring effective health and safety practices per relevant performance standards (such as 1302.47, 1302.94) to maintain children's safety at all times.

4. Implementation Procedures

Head Start programs must outline **how services will be delivered**:

- **Classroom operations:** Teacher-child ratios, schedules, lesson plans.
- **Health and nutrition:** Meal planning, medical follow-ups, dental visits.
- **Transportation:** Safe procedures per 45 CFR 1302.92.
- **Family involvement:** Parent meetings, home visits, family goal planning.

5. Continuous Monitoring and Improvement

Based on self-assessment and monitoring, adjust the action plan for the next year or make mid-year changes if needed. Share data and progress with stakeholders (families, staff, Policy Council, community) to maintain transparency and engagement.

- **Child assessments:** Ongoing screenings and developmental observations.
- **Program evaluations:** Internal reviews, self-assessments, and annual federal monitoring.
- **Staff development:** Professional development based on observed needs.
- **Quality improvement:** Modify services based on data, feedback, and compliance reviews.
- **Evaluation & Self-Assessment**
 - At least once per program year, conduct a **self-assessment** (with participation from Policy Council, staff, and community) to evaluate effectiveness, compliance, and progress toward goals.
 - Self-assessment findings feed into both the evaluation of the current year's action plan and the revision of long-term goals.
 - Report self-assessment results, strengths, weaknesses, and an improvement plan to the governing body and Policy Council.

6. Documentation

- Program plans and updates.
- Community assessments and family input records.
- Child and family outcome reports.
- Staff training records.

Professional Development & Training

To support continuous improvement and high-quality service delivery, the program will implement a systematic approach to staff training and professional development as required under 45 CFR 1302.92.

Specific requirements include:

1. **Minimum Training Hours:** All staff, consultants, and volunteers must complete at least 15 clock hours of professional development per year.
2. **Mandatory Reporting Training:** Provide annual training on recognizing and reporting suspected or known child abuse and neglect in compliance with applicable federal, state, local, and tribal laws.
3. **Social-Emotional Development:** Annual training in positive strategies to understand and support children's social and emotional growth (e.g., behavior support, trauma-informed practices).
4. **Family Engagement Training:** Staff working in child and family services must receive training on evidence-based family engagement strategies.
5. **Competency-Building in Specialized Areas:** Child- and family-service staff (including health, disabilities) must receive training to build competencies that improve child and family outcomes (e.g., working with children with disabilities, collaboration with health services).
6. **Research-Based Professional Development for Educators:** The program will use research-based approaches for education staff development, aligned with:
 - Implementation of the Head Start Early Learning Outcomes Framework (ELOF)
 - Family partnerships
 - Supporting children with disabilities and dual language learners
 - Managing challenging behaviors
 - Supporting transitions (e.g., to kindergarten)
 - Using data (assessments) to individualize teaching practices.
7. **Coaching Strategy:**
 - Implement a coordinated, research-based coaching model for education staff.
 - Assess staff strengths/needs to identify who receives intensive coaching (observations, feedback, modeling).
 - Coaching should align with the program's school readiness goals, curricula, and professional development goals. Coaches should be knowledgeable in adult learning, data use, and teaching practices.
 - Policies must ensure that assessment results are not used **punitively** — staff identified for support must be given time and resources to improve.
8. **Adaptation Flexibility:** If the program needs to adapt its professional development model significantly (outside the norms in (c) above), it must partner with outside early childhood experts to ensure it still meets program goals.

Pursuant to 45 CFR 1302.11, 45 CFR 1302.12–1302.16, 45 CFR 1302.91–1302.102, 45 CFR 1302.92(b)(1–5), 1302.100, 1302.102(a)(1–4), 1302.102(b)(1–2)

RECRUITMENT, SELECTION, AND ENROLLMENT

Purpose

The recruitment process is designed to systematically identify and reach children from the most disadvantaged households. The grantee conducts a Community Assessment of Webb County, Texas, to determine community strengths, needs, and available resources. This assessment includes:

- Demographics of Head Start–eligible children and families
- Availability of child care programs
- Estimated number of children with disabilities
- Social service needs of eligible families

The Community Assessment guides the development of program goals and objectives, informs program planning, and determines the specific recruitment areas within the service area. Children with the greatest needs are actively sought and considered for selection once they meet the program's selection criteria.

The program serves eligible children who meet the age requirement by September 1 of the enrollment year and will enroll at least 90% of children from low-income families. Up to 10% of funded enrollment may consist of families who exceed income guidelines. Eligibility is verified prior to enrollment. Community Assessment results and parent surveys inform the prioritization of selection criteria. The assessment is updated annually for two years following a full review.

The program maintains signed eligibility documentation for each enrolled child. Applications are accepted year-round, and staff assist families through the application process. A waiting list is maintained and ranked according to program selection criteria to ensure vacancies are filled promptly. Each enrolled Head Start child may remain in the program until kindergarten is available.

Responsible Persons

Recruitment is a collaborative effort among:

- Head Start Family and Community Partnership staff
- Education and disability staff
- Head Start parents
- Local community agencies
- Public school districts

Process

Recruitment begins each April. Family Service Workers lead recruitment using a variety of strategies:

1. Posting informational materials in grocery stores, public agencies, and other key community locations
2. Distributing flyers to community partners and local education agencies
3. Participating in media announcements (radio, newspaper, and television)
4. Conducting targeted, door-to-door recruitment based on identified needs to:
 - Locate the most at-risk and eligible children and families
 - Maintain a strong waiting list

Collaboration with community agencies serving Head Start-eligible children is essential. Family Service Workers meet with agency representatives to schedule appointments and screen for eligibility. Presentations are conducted at nonprofit and social service agencies to inform families about Head Start services. Community partners are encouraged to refer clients.

Recruitment of Children with Disabilities

Recruitment of children with disabilities is closely coordinated with community partners, including Early Childhood Intervention services, rehabilitation centers, and school districts. These partnerships help ensure all eligible children with disabilities receive needed services.

Family Service Workers ensure that the program maintains full enrollment. Applications are typically completed at Head Start/Early Head Start centers or at UISD/LISD campuses, but accommodations are made for families unable to visit in person. Enrollment also occurs at community events, health fairs, and in family homes. The Specialized Services Coordinator supports recruitment by assisting with home visits, coordinating with specialized providers, and informing parents of available disability services.

SELECTION OF HEAD START CHILDREN AND FAMILIES

Purpose and Procedures

Selection is conducted in accordance with all applicable Federal regulations. Children from families with the lowest income and greatest need are given priority. Enrollment occurs year-round, and families experiencing crises are prioritized as soon as openings become available. Family Service Workers, the Assistant Head Start Director II, and the Program Director oversee the selection process.

Waiting List

The Family and Community Partnership staff maintain a waiting list for each center. Enrollment from the list is prioritized as follows:

1. **Families with the greatest need**, including:
 - Referrals from Child Protective Services
 - Family crises (domestic violence, displacement, etc.)
 - Families eligible for or potentially eligible for public assistance (including TANF child-only payments)
 - Children with disabilities
 - Foster children
 - Homeless families (as defined in 45 CFR 1305)
2. Four-year-old children are prioritized over three-year-old children.

ENROLLMENT

Enrollment follows policies established under 45 CFR 1302.15 and other relevant Federal regulations.

1. Services are provided to children from families meeting HHS income guidelines and demonstrating the greatest need. At least 90% of enrolled children must be from low-income families.
2. Head Start applicants must be three (3) years old on or before September 1 of the enrollment year.
3. At least 10% of enrolled children must be children with disabilities, as defined by Head Start regulations.
4. Families exceeding poverty guidelines may be enrolled up to 10% of funded enrollment, with priority given to:
 - CPS referrals
 - Families in crisis
 - Children with disabilities

Enrollment Procedures

Enrollment occurs year-round. Family and Community Partnership staff assist families in completing applications. Enrollment typically takes place at Head Start/Early Head Start centers or UISD/LISD campuses, and may also occur:

- By appointment
- Through walk-ins
- At health fairs or community events
- In the family's home

Families receive the following information and requirements:

- Overview of program services
- Required documentation:
 - Income verification
 - Birth certificate
 - Immunization record

- Proof of residence (utility bill)
 - Verification of other assistance received
- List of center locations
- Referral to the Laredo Health Department for immunization updates
- Referral to community agencies for emergencies or special needs
- First day of class

Waiting List

Applications are accepted year-round to maintain an active waiting list. Eligible children are placed on the list if no current vacancy exists.

Enrollment at the Start of the Program Year

Family Service Workers:

1. Accept and process applications
2. Interview families and complete enrollment documentation
3. Notify families of appointments to meet their child's teacher
4. Forward completed documents to education staff, then finalize verification

Teachers receive class lists and student folders prior to the first day of class. Recruitment continues to maintain a waiting list in alignment with selection criteria.

Re-Enrollment

Each child remains eligible for Head Start services until kindergarten or first grade becomes available in the community. The program may decline to re-enroll a child if compelling reasons exist, such as a significant increase in family income or the presence of another child with greater need. Children who have been deemed income-eligible remain eligible for both the current and following program year.

Vacancies

Attendance is monitored regularly using an established form that tracks reasons for absences and identifies attendance trends. For non-medical absences, staff provide family support. Chronic absenteeism is investigated before declaring a slot vacant.

The program must maintain funded enrollment. When a vacancy occurs, it must be filled within 30 calendar days unless fewer than 60 calendar days remain in the program year.

FUNDING APPLICATIONS/FINANCIAL REPORTS

PURPOSE

To outline the procedures required for reviewing financial reports, processing budget revisions, and preparing refunding and new grant applications.

STAFF RESPONSIBILITY TO THE BOARDS

Head Start staff must provide the Governing Board and Policy Council with clear, accurate information and supporting documentation to support informed decision-making. Staff will schedule training on how to interpret budgets and expenditure reports as needed, particularly when new members are seated.

It is the responsibility of Head Start staff to ensure that all technical assistance is delivered in a supportive, respectful manner that promotes confidence and encourages meaningful participation. Trainings should motivate members, build decision-making skills, and avoid overwhelming or intimidating participants.

POLICY COUNCIL BOARD

Each October, the Policy Council Chairperson appoints a Budget Committee to review and recommend major budget changes, as well as to approve or disapprove new or refunding applications. Monthly financial reports are provided to Policy Council members for review and discussion.

REFUNDING APPLICATION AND TIME TABLE

Before work on the refunding budget begins, the Head Start Director is responsible for training Policy Council members on the application process. Input from staff and parents is gathered between March and April. The Director also solicits input from the County Auditor's Office. The following goals guide the planning process:

1. A child benefits most from a comprehensive, interdisciplinary program that supports development and addresses challenges. The child's family and community must be actively involved. Program design must build on the strengths and unique experiences of each child, with families as key partners in development. Local communities may design creative approaches as long as core program goals, objectives, and performance standards are met.
2. Results from the Community Assessment play a central role in planning.

Refunding Grant Planning Schedule

The same steps apply when preparing a new grant application; only the months may vary based on submission deadlines.

January & February

Financial objectives are developed using the Community Assessment and the Strategic Plan, including long-range goals and short-term objectives. Program options and related goals must be approved by the Policy Council.

March

Staff and parents are notified to submit input and needs for consideration. Input is gathered through staff meetings, parent committees, and Policy Council meetings.

April

Head Start administrative staff develop the budget using recommendations from the Policy Council Budget Committee and input from members of the Commissioner's Court. Additional input is sought from the County Auditor, Human Resources Manager, and Governing Body.

April / May

The Head Start Director presents the proposed budget to the Policy Council for approval or disapproval.

May

The Head Start Director presents the proposed budget to the Governing Board.

June 1

Deadline for submission of the refunding application.

This schedule aligns with guidance from the Regional Office and follows the funding cycle of the Webb County Head Start program.

Pursuant to 45 CFR 1303.2 and 1303.3.

POLICY COUNCIL, POLICY COMMITTEE, AND PARENT COMMITTEE REIMBURSEMENT

PURPOSE:

To develop procedures to enable low-income members (Policy Council and/or parent committee members) to participate fully in their committee responsibilities by providing, if necessary, reimbursements for reasonable expenses incurred by the members.

PROCEDURE:

The Policy or Parent Committee members will follow the following procedures.

- a. Member will submit request in writing to Parent Involvement Coordinator.
- b. Member will submit appropriate invoices.
- c. Head Start Director must approve reimbursement request.
- d. Payment dispersed to members.

REIMBURSEMENT INCIDENTALS:

- a. Gasoline/Bus or taxi fare
- b. Baby Sitter
- c. Meals (if applicable)
- d. Other incidentals

Pursuant to 45 CFR 1301.3 (e)

ANNAUL LOCAL SELF-ASSESSMENT

PURPOSE

To establish the process used by the Webb County Head Start Program to conduct its annual Self-Assessment. The Self-Assessment provides a systematic method for evaluating management systems and program operations in order to strengthen services for children and families. It also offers an opportunity to engage program leaders—including parents, Policy Council members, governing body members, and community stakeholders—and increases staff awareness of program operations and community perceptions. Through this process, the program reinforces shared decision-making and continuous advancement toward excellence.

GOALS

- Promote continuous quality improvement to enhance services for children and families
- Ensure compliance with all Federal mandates, including the Head Start Program Performance Standards and the Head Start Act
- Advance the program toward organizational excellence

RESPONSIBLE PARTIES

- a. **Webb County Commissioners' Court:** Holds overall responsibility for guiding and overseeing the Self-Assessment process.
- b. **Head Start Director:** Responsible for managing the process and providing training to participants.
- c. **Policy Council:** Must approve the Self-Assessment process prior to its implementation and participate in the assessment activities.

PROCESS

Preparing for Self-Assessment

The Head Start Director initiates the process by assembling a leadership team, informing the Policy Council and Commissioners' Court, and selecting qualified participants for Self-Assessment teams. All participants receive training on applicable regulations and on the procedures required to complete the Self-Assessment tools assigned to their team.

Collecting and Synthesizing Information

During this stage, teams gather data and analyze it to identify patterns of need, root causes, and systemic issues. The program may request clarification on regulations or policies from the Federal Program Manager, if necessary. This step establishes priorities for change and improvement.

Interpreting the Information

Team members observe program activities, review records and documents, conduct interviews, and summarize their findings using the provided instructions. They synthesize information from multiple sources to identify program strengths, specific weaknesses, and areas needing improvement.

Strengthening the Program

Self-Assessment findings are used to drive meaningful program improvements. Leaders develop program improvement goals, desired outcomes, and action plans based on the results. Both the findings and the improvement plan are communicated to the Policy Council, Webb County Commissioners' Court, parents, and community partners.

PARTICIPATING MEMBERS

- Webb County Commissioners' Court
- Head Start Policy Council
- Consultants
- Management staff
- Coordinators
- Center staff
- Parents

PROGRAM IMPROVEMENT PLAN

- Developed by the Head Start Director and management staff based on Self-Assessment results
- Submitted for approval to the Webb County Commissioners' Court and the Policy Council

SELECTION/COMPOSTION OF POLICY COUNCIL AND POLICY GROUP

PURPOSE:

To determine the composition of the members serving on the Head Start Policy Council.

TYPE OF REPRESENTATIVES:

- At least 51% of the Policy Council members must be parents of currently enrolled children.
- Community representatives are selected from the local community.
- Former Head Start Parents
- Major public and private community, civic or professional organizations.

METHOD OF SELECTION:

In September, at the monthly parent meeting, parents from each Head Start center elect a Policy Council Representative and an Alternate. Head Start staff members and their relatives are not eligible to serve on the Parent Committee or the Policy Council in a voting capacity.

Community Representatives are solicited from the community. Community Representatives must be familiar with community resources, and/or have the expertise in serving low-income children and families. A perspective representative is required to submit a letter to the Policy Council stating their intent to participate. The letter is then submitted to the Policy Council, who then votes to accept or reject the applicant request.

TERM OF OFFICE:

Both parent and community representative must stand for election or re-election annually. Membership is limited to a combined total of five years.

MEETING:

A monthly meeting is held the third or fourth Thursday of the month.

A Special Meeting and Committee Meetings can be called on an “as needed” basis.

FUNCTIONS AND RESPONSIBILITIES - AT A MINIMUM:

- Work in partnership with key management staff and the Commissioners’ Court to develop procedures and policies.
- Approve or disapprove all funding applications.
- Plan and coordinate the program’s goals and objectives
- Procedures for defining recruitment, selection and enrollment priorities.
- Approve procedures for the program’s Self Assessment and Independent audit.
- Assist parent committees in planning, coordinating and organizing program activities.
- Hire and terminate the Head Start Director and Head Start Staff.

PARENT REPRESENTATIVES RESPONSIBILITY:

Each Policy Council member is responsible for giving a report to the parents at the center(s) that they represent. The report must include all the activities that took place during Policy Council meetings. This procedure will keep all Head Start parents informed of all program activities and Commissioners’ Court approvals.

STAFF RESPONSIBILITIES:

During the first Policy Council meeting in September, the Head Start Director is responsible for providing training to the members on their responsibilities and functions. During the month of October, Parliamentary Procedure training is provided to ensure that the members are aware of the mechanics of conducting meetings. Trainings are on-going throughout the year to both the Policy Council and the Governing Board. Head Start staff, at the request of the Policy Council Chairperson, attends Policy Council meetings to provide guidance, not to conduct the entire meeting.

Pursuant to 45 CFR 1301.3(a)(b)(1-2) (c) (1-2) (d) (1-4)

**GOVERNING BODY AND POLICY COUNCIL SHARED DECISION MAKING
MANAGEMENT/RESPONSIBILITIES COMMITTEE****PURPOSE:**

To determine procedures on how the Governing Body and the Policy Council will implement shared decision-making.

SHARED DECISION-MAKING:

Strategies for shared decision-making between the Webb County Commissioners' Court and the Policy Council will be as follows:

The Head Start Director will ensure that both Boards receive regular and accurate information about the program. This will include proposed policies, funding, program changes and/or concerns. This will be accomplished through meetings or conferences, forums for open discussions between the groups, joint meetings on specific issues or concerns, and/or open channels of communications. This procedure will enable both Boards to make appropriate shared decision-making during their meeting.

Pursuant to 45 CFR 642 (d) (2) (A-I) of the Head Start Act

**INTERNAL DISPUTE RESOLUTION BETWEEN GOVERNING BODY AND
POLICY COUNCIL
PROCEDURES FOR RESOLVING IMPASSE SITUATIONS****Webb County Commissioners Head Start Program Procedures for Resolving
Impasse Situations****Background:**

Each Grantee and Policy Council jointly must establish written procedures for resolving internal disputes, including impasse procedures, between the governing body and policy group.

Introduction:

In cases of non-concurrence between the Governing Board and the Policy Council on significant issues and the absence of an established arbitration procedure, the Policy Council could be circumvented. This would violate the Head Start Performance Standards and could prompt lawsuit against the Grantee. Additionally, an excessive amount of time is spent attempting to settle issues without a standardized procedure where impasse situations occur. A disruption of Head Start services to families and children could take place in some instances, and parent/staff morale suffer as a result of impasse situations.

Purposes:

- To resolve impasse situations without outside bidding and impartial arbitration.
- To preserve respect and exemplify the partnership principle in Head Start, despite differences between the parties involved.
- To uphold the partnership principle in Head Start.
- To uphold the interest of the children served by the program.

Definition of Impasse:

Impasse occurs when the Governing Board proposes final action in the fourteen function areas of concurrence, as described in the Governance and Management Responsibilities, and the Policy Council does not concur within 15 working days or by the time of the next regular scheduled Policy Council meeting, whichever occurs later.

Impasse Committee Composition & Powers:

Impasse Committee is composed of six (6) persons. Three (3) are selected by the Governing Board, and three (3) by the Policy Council

The Head Start Director shall act as a resource person to the Impasse Committee.

The Impasse Committee shall convene on an informal basis for the purpose of concurrence and the subsequent assurance of mutually agreed recommendation to the Governing Board and the Policy Council.

Preliminary Procedures:

1. After informal discussions, if the Commissioners' Court believes the Policy Council will not approve a decision and the Commissioners' Court wishes to formalize the approval process, they should notify the Policy Council in writing. The notice shall contain statement of the reason for supporting the proposed decision or action.
2. Within ten (10) days after receipt of the notice, the Policy Council shall hold a special meeting for consideration of the proposed action.
3. Immediately after the special meeting, the Policy Council shall notify the Commissioners' Court in writing of its approval or disapproval of the proposed action. The notice shall contain a statement of the reason for approval or disapproval.

4. In the event of a disapproval, and if the Commissioners' Court desires further consideration of the matter, they shall initiate a meeting with the Policy Council for the purpose of attempting to resolve their differences.
5. If, after these efforts, the Commissioners' Court and the Policy Council are unable to reach agreement, the proposed action shall not be taken. The Commissioners' Court must invoke the arbitration procedures if it is unable to abide by the decision on the Policy Council.

Arbitration Committee Composition and Powers:

The Arbitration Committee is composed of six (6) arbitrators (3 representing each Board). However, three (3) members must be disinterested parties; One selected by the Governing Board, one (1) selected by the Policy Council, and one (1) mutually selected.

A list of the Arbitrators, with their addresses and phone numbers, and ranked in the order in which they were called to serve on the Arbitration Committee, shall be forwarded to Regional Head Start office.

Arbitration Committee members will send written notice of the resolution of the impasse to the Policy Council, the Commissioners' Court and the Head Start Regional Office.

Notice of Impasse:

The Webb County Judge and the Policy Council Chairperson must send written notice of impasse within five (5) working days following preliminary decisions of non-concurrence.

The Impasse Committee shall be called to convene by the Head Start Director with fifteen (15) working days (or the scheduled meeting date of the Policy Council or the Board; whichever is the later) following non-concurrence.

The Arbitration Committee shall be called to convene within fifteen (15) working day of the scheduled meeting date of the Policy Council or the Commissioners Court (whichever is the later), following the Impasse Committee's final attempt to resolve issues of non-concurrence.

Notice or Arbitration Decision:

The Arbitration Committee shall notify the Policy Council, the Commissioners' Court, and the Regional Head Start office within five (5) working days of its decision on issues of non-concurrence.

The Regional Office shall notify the Policy Council and the Commissioners' Court of the Arbitration Committee's (as convened by the Regional Office) decision on issues of impasse or non-concurrence.

Scope of Arbitration:

Biding arbitration shall prevail in the event of impasse between the Policy Council and the Commissioners' Court on the following issues on Appendix A- Governance & Management Responsibilities.

1. Part III, Human Resources Management Section (b) and (d)
2. Part I, Planning, Section (e)

Breakdown of Arbitration Procedure:

Should the Arbitration Committee not convene within 15 working days of impasse, the Regional Office of Project Head Start shall request to convene the Arbitration Committee.

Cost Incurred:

Cost incurred in Arbitration procedures will be absorbed by the Head Start Program and the Webb County Commissioners' Court.

Interested Parties:

Interested parties shall include any parent/family member of children currently enrolled in the Head Start Program, any Head Start staff, and any member of the Policy Council and Commissioners' Court.

Statement of Commitment:

To make every good faith effort to resolve differences between the Commissioners' Court and the Policy Council on an amicable basis, so as to avoid impasse and having to enter with the arbitration procedure. If in the event of impasse or arbitration, the parties involved are committed to cooperate fully in all respects with the Impasse Committee and/or Arbitration Committee in their efforts to resolve impasse issues. This procedure is committed to resolving issues of impasse and non-concurrence. The process represents the true spirit of Head Start and thus, both reflect and respect the tenets of the legislation.

Pursuant to 45 CFR 1301.6(a)(1-3)(b)(c)

**RESOLVING COMMUNITY COMPLAINTS
CLIENT RIGHTS COMMITTEE PROCEDURES**

Purpose

The purpose of the Client Right Committee is to provide due process recourse to the clients of this program regarding allegations brought against them by program staff and volunteers, or other program participants when such allegations result in actions by the program to suspend or terminate services. The Clients Right Committee shall also review all complaints to the committee by a client (s) concerning client abuse, discrimination, denial of services or other actions allegedly caused by the program, its employees or volunteers which infringe on the client(s) rights to be served.

Selection of Committee Members

The committee members are appointed to serve a period of one year. The membership is composed of a total of six (6) persons appointed by the Head Start Director from three categories: two (2) county staff representing county departments; two (2) Head Start Policy Council members; and two (2) citizens who are not employed by the county.

Client Complaints Procedures:

1. The Clients(s) shall present all grievances in writing to the Head Start Director using the appropriate form made available from staff.
2. The Head Start Director shall exhaust all means to resolve the grievance within three (3) working days. If the Director deems that he/she is unable to resolve the grievance, he/she will submit all pertinent documentation to the Clients Rights Committee.
3. The committee shall hold a hearing within twelve (12) working days of receipt of client's written grievance, giving duly written notice to clients within three (3) days of the hearing.
4. The client may seek legal counsel at no expense to the program. Claimant has the right to present testimony and bring forth witnesses.
5. The program, as respondent, reserves the right to seek legal counsel from the County's legal department, produce records to substantiate and support its hearing presentation, including the testimony of staff/volunteers and participants.
6. The committee chairperson shall present the findings of the hearing, along with recommendations to the Head Starts Director, within five (5) working days.
7. The Head Start Director shall issue the decision within three (3) working days of receipt of Committee recommendations. The claimant and the Chairman of the committee shall receive written notice of this action.
8. If the clients(s) is/are not satisfied with the decision, a period not to exceed five (5) working days is given to allow client to present written complaint to the Commissioners' Court.
9. The Commissioners' Court shall review the committee's recommendations and the decision of the Head Start Director under executive session at the next regular board meeting and make a final decision for the program.
10. All decisions made by the Commissioners' Court are final for internal purposes of the program. The client(s) shall seek outside legal recourse if the board's decision is not deemed as fair or satisfactory to the client(s).

Hearing Format:

A quorum of five (5) members will be required to initiate the hearing. The claimant legal representative and witnesses shall be given an opportunity to present their testimony and/or records, documents and other written evidence. The respondent(s) shall be given an opportunity to present their testimony from staff, volunteers, participants, including program records and files relevant to the case. After both parties have made their presentations, the committee shall privately review all of the information, testimony and evidence to render a decision by majority of vote for its recommendation. The Committee Chairperson shall give oral notice to both parties of its recommendations, which shall be forwarded in a written form to the Head Start Director for his/her decision. The Chairperson shall advise both parties of other resources as set out in the procedures.

Local Policy

INTERNAL CONTROLS

Webb County, the grantee agency, has an Audit Department, headed by the County Auditor, and a Treasury Department, headed by the County Treasurer. These departments ensure that all funds are safeguarded with the appropriate fiscal procedures and accounting principles.

Pursuant to 45 CFR 1303.2 and 1303.3

ANNUAL INDEPENDENT AUDIT

1. Independent Annual Audit

- An annual audit is conducted by **an** independent accounting firm.
- Independence ensures objectivity and compliance with regulatory standards.

2. Selection of Auditing Firm

- The firm is selected through a Request for Proposal (RFP) process, followed by negotiations.
- Extensions to the original contract are allowed as recommended by the County Auditors and approved by the Commissioners' Court.
- This process follows Texas Government Code Section 262.024(a)(4), which provides certain exemptions from competitive bidding.

3. Quality Review of Firms

- All selected firms must pass a quality review according to standards set by:
 - The American Institute of Certified Public Accountants (AICPA)
 - The Texas Society of Certified Public Accountants (TXCPA)

4. Funding for Audits

- Audit costs are budgeted and allocated proportionally among all funds that are audited.
- Ensures fair distribution of expenses across funding sources.

5. Audit Reporting Requirements

- All reports must comply with fund-specific regulations, including:
 - The Single Audit Act of 1984
 - OMB Circular A-128, which covers audits of state and local governments

These procedures are in accordance with 45 CFR 647 [42 U.S.C. 9842] (a-c) of the Head Start Act, which governs financial accountability and auditing requirements for Head Start programs.