

CSNT Head Start Monthly Report

Program Year 01 2020 06CH011282/01 2020

CSNT HS Report
Revised 2/21/17

Attendance/Enrollment

	December	January	February	March	April	May	June	July	August	September	October	November
Funded Enrollment	516	516	516									
# additional students (partnerships)	9	11	9									
% with Special Needs	6%	7%	8%									
ADA Funded Enrolled* (516)	516	516	516									
Enrollment (w/additional students)	525	527	525									
Present/ Absent	476/49	477/50	471/54									
* If below 85% (Why) -	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

Non-Federal Share

\$965,823 \$580,353 \$385,470 60% Needed

	December	January	February	March	April	May	June	July	August	September	October	November
\$385,470	\$ 122,595	\$ 132,053	\$ 130,822									

Admin Expenditures (including non-federal share)

*Should not be above 15%	December	January	February	March	April	May	June	July	August	September	October	November
12%	\$ 37,765	\$ 98,536	\$ 150,027									

Meals/Reimbursements

\$42,517	December	January	February	March	April	May	June	July	August	September	October	November
# of service days	14	18	19									
# of meals served	5,496	6,924	7,014									
CACFP Reimbursement	\$ 12,081	\$ 15,143	\$ 15,293									

Program Monitoring

	December	January	February	March	April	May	June	July	August	September	October	November
# Child Files Reviewed	195	195	141									
# Classrooms Observed	42	47	73									
Incomes Verified	15	6	4									
# Parents Interviewed	20	4	10									
# of Staff interviewed	0	18	14									
# Bus Routes Observed	3	1	2									
# Staff Files Reviewed	5	0	0									
# Community Contacts	11	68	72									
# of Findings Corrected	38	22	30									

Annual Self-Assessment Findings

Date: Week of 2/18/2020 Completed 0/00/00

	December	January	February	March	April	May	June	July	August	September	October	November
# of findings	2	3	3									
# findings corrected	2	0	0									
# findings remaining	0	3	3									

Annual Detailed Monitoring Findings

Week of 1/17/2020 Completed 0/00/00

	December	January	February	March	April	May	June	July	August	September	October	November
# of findings	7	9	9									
# findings corrected	7	2	5									
# findings remaining	0	7	4									


Program Updates

Preparing for Spring Activities
IM-HS-20-01 Inclusion of Children with Disabilities
PI-HS-20-01 Head Start Service Duration
IM-HS-20-02 Head Start Modular Units

From: Office of Head Start <no-reply@hsicc.org>
Sent: Thursday, March 5, 2020 10:30 AM
To: berny.harris@csntexas.org
Subject: ACF-IM-HS-20-02 Head Start Modular Units

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 U.S. Department of Health & Human Services  Administration for Children & Families

OFFICE OF HEAD START

ACF Administration for Children and Families	U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES	
	1. Log No. ACF-IM-HS-20-02	2. Issuance Date: 03/05/2020
	3. Originating Office: Office of Head Start, Office of Grants Management	
	4. Key Words: Modular Unit; Portable Prefabricated Structure; Mobile Units; Manufactured; Real Property; Disposition	

INFORMATION MEMORANDUM

TO: All Head Start and Early Head Start Agencies and Delegate Agencies

SUBJECT: Head Start Modular Units

INFORMATION:

A modular unit is defined as "a portable prefabricated structure made at another location and moved to a site for use by a Head Start grantee to carry out a Head Start program, regardless of the manner or extent to which the modular unit is attached to underlying real property." The definition includes modular units used for any program purpose, including classrooms, kitchens, administrative offices, and storage buildings. See [Terms, 45 CFR §1305.2](#). The purchase of any modular units with Head Start funds is subject to the provisions of [45 CFR Part 1303 Subpart E](#).

Many different types of prefabricated structures fall within the general term "modular unit." Some are structurally similar to traditional construction, subject to local building codes and firmly attached to an underlying foundation. These units can provide high-quality learning environments with a useful life similar to traditional construction.

At the other end of the spectrum are units that arrive on wheels and are installed by placement on supports without a full foundation. Local building codes are not usually applicable to these types of units. They are often referred to as manufactured or mobile units. Their useful life is significantly less than traditionally constructed buildings. Especially in harsh climates, these units tend to deteriorate quickly and require significant ongoing maintenance. They also lose structural stability, develop mold issues, and lose quality as a learning environment much sooner than high-quality modular units or traditional construction. See [Teaching and the learning environment, 45 CFR §1302.31](#).

The Office of Head Start (OHS) recognizes there are circumstances when modular units are a quality, cost effective option for program services. However, purchase of a modular unit should not be a grantee's first choice when the option of construction or purchase of a traditionally built facility exists in the community. Similarly, when

replacing older modular units, grantees should consider whether better quality modular units, construction, or purchase options are available in the community. While reasonableness of cost should always be a consideration for grantees, low-cost modular units are not a preferred option when other better-quality facility options are available.

To assure modular units used as Head Start facilities result in quality, cost effective learning environments, OHS is implementing the following requirements.

Application for Purchase of a Modular Unit

When a grantee applies for purchase of a modular unit under **45 CFR Part 1303 Subpart E**, the following additional information is required per **45 CFR §1303.44(a)(14)**.

1. A statement indicating whether the modular unit will be classified as real property or equipment in the grantee's financial records. This classification must be maintained until the modular unit is disposed of in accordance with **Real Property, 45 CFR §75.318(c)** or **Equipment, 45 CFR §75.320(e)**, as applicable.
2. A description of the procurement procedures that will be used to purchase the modular unit in compliance with **45 CFR §75.329**.
3. If the modular unit proposed for purchase will be classified as real property, the grantee must submit standard form (SF)-429 with Attachment B. If the modular unit proposed for purchase will be classified as equipment, follow **45 CFR §75.407(a)(7)** for prior approval. The modular unit must be included in the grantee's equipment inventory maintained in accordance with **45 CFR §75.320(d)(1)–(5)**.
4. The cost comparison required by **45 CFR §1303.45** must address the full cost of initial purchase of the modular unit. This includes site acquisition and preparation, delivery, set-up, and additional site work needed (e.g., ramps, fencing, parking, play area, landscaping). Estimated operating costs, including ongoing maintenance and repairs, must be also be provided, with an assumed estimated useful life of 15 years. For purposes of comparison with available alternatives within the community (see below), the cost of replacement of the modular unit at the end of 15 years must also be included.
5. Modular unit costs must be compared to available alternatives within the community, including construction of a new facility and purchase or lease of an existing facility (with any associated renovation costs). Initial and ongoing costs for comparable facilities must be estimated, including depreciation, with an assumed useful life of 30 years.
6. The application must describe the placement of the modular unit proposed for purchase. It also must indicate if the modular unit will be placed on leased or grantee-owned property and the method of installation (e.g., placed on a poured foundation, on blocks, or other supports). The extent to which the modular unit can be removed and relocated must also be addressed, including whether it is possible to relocate the unit without significant damage to its structure once installed.
7. The statement of a real estate professional described in **45 CFR §1303.42(b)** must clearly show the realtor making the certification considered the options of construction, purchase, or leasing of facilities as an alternative to purchase of a modular unit.

Request for Disposition of a Modular Unit

The disposition process for a modular unit depends on how the unit was classified in the grantee's financial records (real property or equipment) at the time of purchase and during its period of ownership by the grantee. A grantee may not change the historic classification of a modular unit for purposes of disposition. If classified as real property, the unit is subject to the disposition requirements described in **45 CFR §75.318(c)** and **45 CFR §75.308(c)(1)(xi)**. A unit classified as equipment is subject to the disposition requirements described in **45 CFR §75.320(e)** and **45 CFR §75.308(c)(1)(xi)**. For more information, please see the **ACF Property: Disposition** website.

Real Property

When the modular unit has been classified as real property, the grantee is required to submit SF-429 with Attachment C in the **GrantSolutions Online Data Collection (OLDC)** to request approval for disposition of the

unit. Note that line 14e requires the grantee to enter the third-party appraised value of the real property (current market value). Current market value must be established by an independent certified real property appraiser (no more than three years old). The appraisal must be uploaded to the SF-429 Attachment C in **GrantSolutions OLDC** to verify the current market value amount.

The modular unit should be appraised separately from the land upon which it is located. The appraisal must clearly indicate the appraised value of:

1. The land, if owned by the grantee
2. The modular unit value in its existing location

Modular units classified as real property are usually firmly attached to the land upon which they are located. If the grantee does not own the land, all costs related to the proposed disposition (e.g., demolition, site restoration, takedown, moving, and new site preparation) must be identified in the disposition request. If the overall cost of all disposition options result in a net value that is \$0 or less, there is no value for OHS to recover in the modular unit. The Office of Grants Management (OGM) will review all disposition requests in which there is no recoverable value. If there are no issues or concerns, the respective Grants Management Officer (GMO) will approve release of the federal interest.

Equipment

When the modular unit has been classified as equipment and has a current market value of \$5,000 or more, grantees are required to submit the Tangible Personal Property Report—Disposition Request using SF-428 with Attachment C through the Head Start Enterprise System (HSES). Send correspondence to the GMO no later than 30 days before the proposed disposition. The modular unit may be retained, sold, or transferred as directed by the Administration for Children and Families (ACF) in accordance with **45 CFR §75.320**.

When the modular unit has been classified as equipment and has a current market value of \$5,000 or less, the modular unit may be retained, sold, or otherwise disposed of without payment of proceeds to the awarding agency (**45 CFR §75.320(e)(1)**). However, proceeds must be recognized as additive program income and used only for allowable Head Start program expenses. All requests for disposition instructions must be made in writing through HSES Correspondence to the GMO no later than 30 days before the proposed change. If there are no issues or concerns, the respective GMO will proceed with approval to release the federal interest.

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

/ Dr. Deborah Bergeron /

Dr. Deborah Bergeron
Director
Office of Head Start
Office of Early Childhood Development

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**OFFICE OF HEAD START**

ACF Administration for Children and Families	U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES	
	1. Log No. ACF-PI-HS-20-02	2. Issuance Date: 03/11/2020
	3. Originating Office: Office of Head Start	
	4. Key Words: Consolidated Appropriations Act; Appropriations; Fiscal Year (FY) 2020; Funding Increase; Cost of Living Adjustment (COLA); Quality Improvement	

PROGRAM INSTRUCTION**SUBJECT:** FY 2020 Head Start Funding Increase**INSTRUCTION:**

President Trump signed Public Law 116-94, the Further Consolidated Appropriations Act, 2020, on December 20, 2019. Included is \$10,613,095,000 for programs under the Head Start Act, an increase of \$550 million over the fiscal year (FY) 2019 funding level.

This increase includes \$193 million to provide all Head Start, Early Head Start (EHS), and Early Head Start-Child Care (EHS-CC) Partnership grantees a 2% cost-of-living adjustment (COLA); \$100 million for expansion of EHS and EHS-CC Partnerships; \$250 million for quality improvement; and \$4 million to re-establish the Tribal Colleges and Universities Head Start Partnership Program.

This Program Instruction (PI) primarily provides information about the COLA and quality improvement funds available to grantees in FY 2020 and describes the requirements for applying for these funds. All Head Start, Early Head Start, and EHS-CC Partnership grantees are eligible to receive COLA and quality improvement funds. Grantees subject to competition for continued funding through the Designation Renewal System (DRS) are entitled to COLA funds through the end of their current award. However, the Administration for Children and Families reserves the right to delay decisions on quality improvement funding until the outcome of the DRS competitions has been finalized.

Preliminary information is also included on availability of competitive funding for EHS and EHS-CC Partnerships expansion and the Tribal Colleges and University Partnership grants, with more details coming in the near future. State Collaboration grants are not eligible for the COLA due to the statutory cap on their funding in the Head Start Act.

FY 2020 COLA

Each grantee may apply for a COLA increase of 2% of the FY 2019 base funding level. Base funding excludes training and technical assistance funds and any one-time funding received during FY 2019.

Grantees must use COLA funds to permanently increase the Head Start pay scale by no less than 2%. This includes salaries of current staff and the pay range of unfilled vacancies. An equivalent increase must be provided to delegate agencies and other partners to adjust their salaries and scales. Any grantee concerned that they cannot increase salary due to wage comparability issues should ensure public school salaries for kindergarten are included in their considerations.

Sections **653** and **640(j)** of the Head Start Act provide further guidance on the uses and limitations of COLA funds. Sec. 653 restricts compensation to a Head Start employee that is higher than the average rate of compensation paid for substantially comparable services in the area where the program is operating. It also prohibits any Head

Start employee from being compensated at a rate higher than that of an Executive Schedule Level II position, including employees being paid through indirect costs. Sec. 640(j) of the Act requires that the compensation of Head Start employees must be improved regardless of whether the agency has the ability to improve the compensation of staff employed by the agency that do not provide Head Start services.

Any grantee proposing a COLA percentage less than 2% across its pay scale, or differential increases between delegates or partners, must justify its rationale in its budget narrative.

As specified in **Personnel policies, 45 CFR §1302.90**, each grantee is required to establish written personnel policies and procedures that are approved by the governing body and Policy Council or policy committee. They must be available to all staff. Review your personnel policies and procedures since they may contain information relevant to this COLA.

Any remaining funds may be applied to fringe benefits costs, or to offset increased operating costs in other areas of the budget. This includes increased costs in rent, utilities, facilities maintenance and insurance, contractual arrangements, vehicle fuel and maintenance, supplies, and equipment.

FY 2020 Quality Improvement

Each grantee will be allocated a proportionate amount of quality improvement funding based on the number of slots they are funded to serve (approximately \$250 per Head Start slot and \$350 per EHS slot). However, there will be a minimum floor established to ensure all grantees are able to make a meaningful investment in quality, consistent with Sec. 640(a)(4)(C) of the Head Start Act. Grantees are strongly encouraged to invest this funding into ongoing program efforts and activities that help better incorporate a trauma-informed approach that will support children, families, and staff impacted by adverse experiences. Activities must align with Sec. 640(a)(5) of the Act, as outlined in **Attachment A**. However, programs are not bound by the requirements that at least 50% of the funds be used for staff compensation or that no more than 10% of funds be used on transportation. Further, programs have flexibility to use any amount of their quality improvement funding on Early Head Start and/or Head Start, based on community needs, and not to exceed the total amount available in a given grant. If a program chooses to use this flexibility, they must justify how this approach supports the greatest needs of their community.

Importantly, grantees should consider ongoing, sustained investments in quality improvements, as opposed to one-time investments, while also acknowledging one-time investments in FY 2020 may be necessary to sustain ongoing quality improvement. Grantees encountering other one-time program improvement needs are invited to apply for supplemental funding as needs emerge. These separate requests are addressed by priority and subject to availability of funds. Below is further information on the definitions of *trauma* and *trauma-informed approach*, developed by the Substance Abuse and Mental Health Services Administration (SAMHSA) at the U.S. Department of Health and Human Services (HHS).

Trauma occurs when frightening events or situations overwhelm a child or adult's ability to cope or deal with what has happened. These kinds of experiences cause an extended stress response and lasting effects on the physical and mental health of the individual. Trauma can occur in the form of a single event (e.g., a natural disaster or death of a close family member) or as a series of events or chronic condition (e.g., substance misuse, domestic and community violence, child abuse and neglect, extended homelessness, or food insecurity). Exposure to traumatic experiences is more common than most people believe, and the experience of trauma is highly individualized. What is traumatic to one person does not necessarily have the same traumatic effect on another person who experienced the same event or situation. In addition to enrolled children and families, Head Start staff may themselves experience trauma, as well as stress associated with their role in supporting children and families impacted by trauma.

A trauma-informed approach is one that realizes the widespread impact of trauma and understands potential paths for recovery; looks out for potential signs and symptoms of trauma among children, families, and staff; fully integrates knowledge about trauma into program policies, procedures, and practices; and seeks to actively resist re-traumatization. Related activities vary widely. They can include additional qualified staff to lower teacher-child ratios or family service staff caseloads; enhanced mental health partnerships and services for children and families; and transportation services. See **Attachment B** for additional information, including several concrete examples.

There is also flexibility in the use of these quality improvement funds to meet grantees' most pressing local needs. Therefore, a program may apply to use quality improvement funds for activities consistent with Sec. 640(a)(5) of the Act, except that any amount of these funds may be used on any of the activities specified in such section. See Attachment A for the list of activities. If a program applies to invest quality improvement funds in an activity or activities specified under Sec. 640(a)(5) that are not directly related to promoting trauma-informed care and supporting children, families, and staff impacted by trauma, the program must justify why this is the best use of these funds.

The Office of Head Start recently held a webinar on the quality improvement funding, and the webinar recording will be available on the Early Childhood Learning and Knowledge Center (ECLKC) soon.

Application Requirements

Grantees are required to request COLA and quality improvement funds through a grant application. Shortly, grantees will be issued a funding guidance letter specifying each funding level and additional instructions on how to apply for these funds. Grantees will be required to submit their applications in the Head Start Enterprise System (HSES).

EHS Expansion and EHS-CC Partnerships

One hundred million dollars is available to support new grants for traditional EHS and EHS-CC Partnerships to increase access to high-quality infant and toddler early learning. Funding will be awarded by March 2021. A funding opportunity announcement (FOA) is expected in summer 2020. This announcement will equally prioritize EHS expansion and EHS-CC Partnerships, as determined by the needs of local communities. More information on this opportunity will be available later this year.

Tribal Colleges and University Partnership Grants

Four million dollars is available to fund grants to Tribal Colleges or Universities who partner with at least one American Indian and Alaska Native (AIAN) Head Start agency. The grants will be designed to:

- Increase the number of degrees in the early childhood education fields
- Provide assistance to Head Start staff and parents enrolled in such programs
- Develop curricula to promote high-quality services and instruction
- Provide activities to upgrade the skills and qualifications of education personnel
- Offer technology literacy programs for AIAN Head Start agency staff
- Develop and implement virtual learning opportunities

Eligible entities will be Tribal Colleges and Universities meeting the definition in Sec. 316(b) of the Higher Education Act of 1965. Funding will be awarded by the end of September 2020. A FOA is expected in Spring 2020.

Please direct any questions regarding this P to your Regional Office.

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

/ Dr. Deborah Bergeron /

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