	Monroe County School District Head Start Program Standard Operating Procedures/Plans
	Subject: Program Operations Subpart I –Human Resources Management
Effective Date: August 16, 2017	Revision Date:

## **AUTHORITY:**

Office of Head Start (OHS), Administration of Children and Families (ACF)

## **REGULATION REFERENCE:**

Head Start Performance Standards-Human Resources Management 45 CFR 1302.90 Personnel Policies

## **POLICY (Personnel Policies):**

It is the policy of the MCSD Head Start program to follow Monroe County School Board policy requirement to maintain written personnel policies and procedures for the hiring of all staff. Head Start staff employed by independent consultants are also required to follow the District's established personnel policies, procedures and guidelines.

## MCSD PERSONNEL POLICIES (Follow the link for MCSD for personnel policies):

- 1. <u>0170 DUTIES</u>
- 2. 8141 MANDATORY REPORTING OF MISCONDUCT BY CERTIFICATED EMPLOYEES
- 3. 8320.01 PERSONNEL FILES
- 4. 8320.01 PERSONNEL RECORDS
- 5. <u>1590 PERSONNEL FILE</u>
- **6. 3590 PERSONNEL FILE**
- 7. <u>4590 PERSONNEL FILE</u>
- 8. <u>5330 USE OF MEDICATIONS</u>
- 9. 6460 VENDOR RELATIONS
- 10. 7455 PROCEDURES FOR REPORTING FIXED ASSETS

## **PROCEDURES**

The program follows established procedures in hiring employees. Jobs are posted for a minimum of 7 to 10 business days. Jobs are posted on the Monroe County Schools District's (MCSD) Website.

1. All job descriptions delineating duties requirements and working conditions are posted

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on the District website. Instructions regarding how to apply are also made available to each applicant. After the close of the posting period, the Human Resources Department's automated talent selection program records, files and folders, resumes and other related uploads for all applicants. Screening then occurs to qualify candidates as required by the MCSD Recruitment Policies and Procedures. By invitation, the Head Start Director, Manager and/or designee interviews those candidates who possess the skills, knowledge and expertise for the job as advertised. (Policy Council parents or Head Stat parents are invited to participate in the interview process as available).

- 2. Interviews are driven by a set of written questions designed to probe for training and experience proficiency as relates to the position under consideration. The ranking scale is leveled from 1 5 with 1 indicative of least proficient and 5 indicative of the most proficient talent potential. Each applicant interviewed for a specific position is asked the same questions, in the same order during this standardized procedure.
- 3. After all interviews have been conducted, the Head Start/Early Head Start Administrator receives interview packages and submits them to the Head Start Director with a recommendation for hire.
- 4. The Head Start Manager and/or Director scores them by a system referred to as "banding" and submits the package. Final selection(s) of top candidate(s) may then be made. Second interviews are at the discretion of the MCSDHS Director.
- 5. Process for background checks and initial physical exams are conducted for the selected candidate.
- 6. MCSDHS Head Start/Early Head Start will accept or reject the recommendation of an interviewee, verify references, conduct a sex offender registry check, and obtain one of the following:
  - (i) State or tribal criminal history records, including fingerprint checks; or,
  - (ii) Federal Bureau of Investigation criminal history records, including fingerprint checks.

MCSDHS will not hire an employee until background screening is complete.

- (i) Whichever check listed above of that was not obtained prior to the date of hire; and,
- (ii) Child abuse and neglect state registry check, if available.

Local Backgrounds are required for all Head Start/Early Head Start staff to include, consultants, contractors and regular volunteers who have direct contact with children.

2. Continued employment in a position is contingent on qualifications, performance, need, and funding.

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- 3. MCSD Code of Conduct are reviewed with each new staff member and volunteers at new employee/volunteer orientation. Employees/volunteers will sign a standard of conduct form and a copy is kept electronically in FileBound's electronic filing system, which is the district's HR electronic recordation center.
- 4. Each employee receives training including: new employee orientation; child abuse neglect requirements; other training relevant to their job descriptions; and trainings outlined as growth targets in their professional development plan established at the annual staff performance evaluation.

## **Protection of Records:**

MCSD Head Start shall establish and implement procedures that ensure compliance with all applicable federal, state, and local statues for the protection of confidential records, including electronic data.

## **Procedures:**

- 1. There is a controlled and secure area for storing and maintaining files and records including:
  - a. Children's records located at the Head Start Centers
  - b. Children's records located at the Head Start Administrative Offices
  - c. Family records located at the Head Start Centers
  - d. Employee records are located in the Human Resources Department
- 2. Records are not removed from MCSD Head Start or Administrative offices unless otherwise required by law.
  - a. Access to records is restricted to authorized personnel of MCSD Head Start Division, MCSD Government, and Federal monitors/auditors.
  - b. Records are not left unattended in areas accessible to unauthorized individuals.
  - c. Access to electronic data is password protected.
- 3. Written authorization, signed by the client (or the primary caregiver) is required for release of client records and/or other information.
- 4. Matters concerning individual Head Start children and families can only be discussed with appropriate and authorized individual.
  - a. Informal conversation in the presence of visitors or other staff members can be a violation of confidentiality.
- 5. An orientation regarding confidentiality is provided to new employees and volunteers. All employees sign an ethics (confidentiality) policy in ER Portal. Volunteers receive training, which includes knowledge, awareness and understanding of confidentiality law, regulations and procedures. (Documented sign-in sheet).

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- 6. Security procedures that guarantee limited access to confidential information and electronic files related to children and their families are established, through password protected database systems.
- 7. When a breach of confidential information occurs, the agency will refer the incident to the HS Manager who will engage investigative and progressive discipline procedures and appraise the Human Resources Department. This same procedure applies to volunteers and professional consultants as well as Head Start staff.

<sup>\*</sup>These procedures will be evaluated as part of the Self-Assessment.

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## **POLICY (MCSDHS Hiring Former Head Start Parents and Substitutes):**

It is the policy of MCSD Head Start program to follow Monroe County School Board Policies to maintain written personnel policies for the hiring of staff. Current and former Head Start parents must receive preference for employment vacancies for which they are qualified. Head Start is an important place for employment opportunities for parents and a vehicle for providing additional skills for parents who are seeking employment.

## **PROCEDURES:**

**Parents -** MCSD Head Start provides opportunities to receive skill-development or on-the-job training as part of parent involvement activities.

- A. Skill development and on-the-job training is provided through partnerships with local agencies as part of parent involvement activities.
- B. Skill development and on-the-job training are also provided directly in Head Start by encouraging parents to volunteer in the classroom and attend Child Development Associate Credential (CDA) classes.
- C. Current and former Head Start parents who apply for a job with MCSD Head Start, and meet the minimum qualifications of the position, are given preference in the selection process.
- D. Site Coordinators, as part of parental involvement and family partnership agreement discussions, describe the various positions in Head Start as well as outlining the ways parents can become qualified for these positions.

**Substitutes -** Parents are encouraged to apply for a substitute teacher position in Head Start if they obtain a Level II Background screening and meet minimum qualifications for a teacher assistant position.

- A. All substitutes are hired according to MCSD Policies. The applicant should fill out an application through the Monroe County School Board Administrative Offices.
- B. All substitute teachers (on-call workers) are required to undergo a Level II Background Screening before hire.
- C. Substitutes apply on MCSD electronic substitute system.
- D. Substitute teaching staff will complete report to site office managers for direction.

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- E. Substitute teaching staff will receive an evaluation after six (6) weeks of working from school designee.
- F. Substitutes must have transportation and be willing to travel to any of the Head Start schools/sites.

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1302.90(a) (b) (1) (i-ii) (2) (i) (ii) Personnel Policies and Section 648A ((4)(E) of the Head Start Act.

## **POLICY (Background Checks):**

It is the policy of MCSD Head Start program to maintain written personnel policies for hiring of staff and staff employed by independent consultants follows the established personnel policies and guidelines.

The following are MCSD Background Screening Policies:

- 1. 3121.01 CRIMINAL BACKGROUND AND EMPLOYMENT HISTORY CHECKS
- 2. 1121.01 CRIMINAL BACKGROUND AND EMPLOYMENT HISTORY CHECKS
- 3. 4121.01 CRIMINAL BACKGROUND AND EMPLOYMENT
- 4. 3121.01 CRIMINAL BACKGROUND AND EMPLOYMENT
- 5. 1121.01 CRIMINAL BACKGROUND AND EMPLOYMENT
- 6. 5310 HEALTH SERVICES
- 7. 4121.01 CRIMINAL BACKGROUND AND EMPLOYMENT
- 8. 8475 CRIMINAL BACKGROUND CHECKS FOR CONTRACTOR ACCESS
- 9. 8475 CRIMINAL BACKGROUND CHECK NONDISTRICT PERSONNEL
- 10. 2431.04 INTERSCHOLASTIC ATHLETICS/ACTIVITIES ALCOHOL AND DRUG TESTING POLICY

## **PROCEDURES:**

The MCSD Human Resources Department will schedule applicants for background screenings, to include five-year re-screenings with the assistance of the Head Start Department. The MCSD HR Department will conduct background screenings according to MCSD policy. Background screenings are required for all Head Start staff, consultants, and contractors prior to employment along with a physical exam.

The grantee must ensure volunteers do not have unsupervised access to children.

In addition to the initial background screening, MCSDHS will conduct the complete background check for each employee, consultant, volunteer, or contractor at least once every

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five years.

Head Start parents/guardians who volunteer in Head Start classrooms are excluded from screening requirements, unless they are supervising students without an MCSD employee present.

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## **POLICY (Standards of Conduct):**

It is the policy of MCSD Head Start program to ensure that all staff, consultants, and all volunteers abide by the Standards of Conduct. These standards reinforce appropriate professional behavior among staff, guide staff members in ambiguous situations, and help protect staff against allegations of misconduct.

MCSD Policies regarding standards of conduct:

## 5500 - STUDENT CONDUCT

- 2. 5600A STUDENT DISCIPLINE
- 3. 1200 ETHICAL AND RESPONSIBLE CONDUCT
- 4. 4200 ETHICAL AND RESPONSIBLE CONDUCT
- 5. 3200 ETHICAL AND RESPONSIBLE CONDUCT
- 6. 5600 STUDENT DISCIPLINE
- 7. 5610.04 SUSPENSION OF BUS RIDING/TRANSPORTATION PRIVILEGES

## **PROCEDURES:**

In conjunction with MCSD policies, the grantee ensures the following:

- 1. Respect and promote the unique identity of each child and family and refrain from stereotyping based on gender, race, ethnicity, culture, religion, disability, sexual orientation or family composition.
- 2. Follow program confidentiality policies concerning information about children, families, and other staff members.
- 3. Ensure that no child will be left alone or unsupervised while under their care.
- 4. Ensure staff, consultants, contractors, and volunteers implement positive strategies to support children's well-being and prevent and address challenging behaviors;
- 5. Ensure staff, consultants, contractors, and volunteers do not maltreat or endanger the health or safety of children, including, at a minimum, that staff must not:

## (A) Use corporal punishment;

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- (B) Use isolation to discipline a child;
- (C) Bind or tie a child to restrict movement or tape a child's mouth;
- (D) Use or withhold food as a punishment or reward;
- (E) Use toilet learning/training methods that punish, demean, or humiliate a child;
- (F) Use any form of emotional abuse, including public or private humiliation, rejecting, terrorizing, extended ignoring, or corrupting a child;
- (G) Physically abuse a child;
- (H) Use any form of verbal abuse, including profane, sarcastic language, threats, or derogatory remarks about the child or child's family; or,
- (I) Use physical activity or outdoor time as a punishment or reward;
- 6. Violations of any of the above Standards of Conduct that directly affect the health and safety of program participants by staff, consultants, contractors, and/or volunteers, must be reported to the Department of Children and Families (DCF), the appropriate police department, and the grantee's Head Start Director immediately as required by Head Start Program Performance Standard 1302.103(D)(1)(ii).
- 7. All violations will be punishable by disciplinary action, up to and including termination.

<sup>\*</sup>These procedures are recorded electronically and will be reviewed during self-assessment.

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#### **POLICY:**

It is the policy of MCSD Head Start program to ensure that staff, consultants, contractors, and volunteers appropriately handle award and administrative contracts or solicit/accept gifts and favors, services or anything of value in the following manner:

## PROCEDURES (Grantee/Delegate Agencies/Partners for Better Outcomes):

As a part of the Ethics training and signing the Code of Conduct in ER Portal. Staff will:

 Agree to the term, "As an employee of Monroe County School District (permanent or temporary), engage in the award and administration of contracts or solicit/accept gifts, favors, services or anything of value from persons, organizations, contractors or potential contractors". The form will be placed in the employee's MCSD personnel and/or center file.

Violations of the policy of Gifts and Favors will be punishable by disciplinary action, up to and including dismissal.

\*These procedures will be evaluated if used during the Self-Assessment.

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45 CFR 1302.91

## **POLICY (Staff Qualifications and Competency Requirements):**

It is the policy of Monroe County School District Head Start Program to ensure that all staff, wherein all or a portion of their salary is paid for by Head Start or Early Head Start, possess the knowledge, skills, and abilities to perform their assigned functions responsibly.

#### **PROCEDURES:**

The program will ensure high quality service delivery in accordance with Head Start standards and provide ongoing training to support staff in fulfilling their roles and responsibilities.

- 1. All staff, consultants, and contractors engaged in the delivery of program services must have sufficient knowledge, training and experience, and competencies to fulfill the roles and responsibilities of their positions and to ensure high-quality service delivery in accordance with the program performance standards.
- 2. *All* staff and consultants must meet the requirements of their position. In addition, staff is required to meet the qualifications outlined in the Head Start Performance Standards, Head Start Act, Department of the Early Learning Coalition, and Monroe County School Board for each respective position. Examples of these requirements include, but are not limited to, the following:
  - A. <u>Head Start Director</u>. MCSD ensures that Head Start Director hired after November 7, 2016, has, at a minimum, a baccalaureate degree and experience in supervision of staff, fiscal management, and administration.
  - B. <u>Fiscal Officer.</u> MCSD ensures a fiscal officer hired after November 7, 2016, is a certified public accountant or has, at a minimum, a baccalaureate degree in accounting, business, fiscal management, or a related field.
- 3. <u>Family, health, and disabilities management.</u> MCSD ensures that staff responsible for management and oversight of family services, health services, and services to children with disabilities hired after November 7, 2016 have, at minimum, a baccalaureate degree, preferably related to one or more of the disciplines they oversee.
- 4. Education management. MCSD ensures that staff and consultants that serve as education managers or coordinators, including those that serve as curriculum specialist, have a baccalaureate or advanced degree in early childhood education or a baccalaureate degree or advanced degree and equivalent coursework in early childhood education with early education teaching experience.

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- 5. Early Head Start center-based teacher qualifications. MCSD ensures that center-based teachers that provide direct services to infants and toddlers in EARLY Head Start centers have a minimum of a Child Development Associate (CDA) credential *or comparable* credential, and have been trained or have equivalent coursework in early childhood development with a focus on infant and toddler development.
- 6. Head Start center-based teacher qualifications. MCSD ensures that all Head Start teachers, nation-wide, have a baccalaureate degree in child development, early childhood education, or equivalent coursework. As prescribed in section 648 (a)(3)(B) of the Act, a program must ensure that all center-based teachers have at least an associate's or bachelor's degree in child development or early childhood education, equivalent coursework, or otherwise meet the requirements of section 648 (a)(3)(B) of the Act. In addition, teachers whose degrees are not in child development, early childhood development, or equivalent coursework are required to complete eighteen semester credit hours in early childhood education within one year of hire date and begin coursework with 60 days after hire date.
- 7. <u>Head Start assistant teacher qualifications.</u> MCSD ensures Head Start teacher assistance, at a minimum, have a CDA credential or a state-awarded certificate that meets or exceeds the requirements for a CDA credential, and are enrolled in a program that will lead to an associate or baccalaureate degree or, are enrolled in a CDA credential program to be completed within two years of the time of hire.
- 8. MCSD ensures center-based teachers and paraprofessionals demonstrate competency to provide effective and nurturing teacher-child interactions, plan and implement learning experiences that ensure effective curriculum implementation and use of assessment to promote children's process across the standards described in the Head Start Early Learning Outcomes Framework.
- 9. The Mental Health Coordinator must possess a State of Florida License or certified mental health professional license.
- 10. <u>Family services staff qualifications.</u> MCSD ensures staff that work directly with families on the family partnership process hired after November 7, 2016, have within eighteen months of hire, at a minimum, a credential or certification in a social work, human services, counseling, or a related field.
- 11. <u>Health professional qualifications.</u> MCSD ensures health procedures are performed only by a licensed or certified health professional.
  - A. MCSD ensures that mental health consultants are licensed or certified mental health professionals. MCSD must use mental health consultants with knowledge and experience in serving young children and their families, if available in the community.

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- B. MCSD must use staff or consultants to support nutrition services who are registered dieticians or nutritionist with appropriate qualifications.
- C. <u>Coaches MCSD</u> must ensure coaches providing the services described in 1302.92(c) have a minimum of a baccalaureate degree in early childhood education or a related field.

<sup>\*</sup>These procedures will be evaluated as part of the Grantee and Delegate Self-Assessment.

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## **Policy (Internal):**

To ensure the safety and security of all children in accordance with School Board of Monroe County Administrative Procedures 8462 – Student Abuse, Neglect, Child Abuse and compliance with Mandated Child Abuse/Child Neglect Reporting by Office of Head Start.

# <u>8462</u>- STUDENT ABUSE AND NEGLECT (The School Board of Monroe County Bylaws & Policies)

The School Board is concerned with the physical and mental well-being of the students of this District and requires that school employees comply with the mandated identification and reporting of known or suspected cases of child abuse, abandonment, or neglect in accordance with law.

## **Procedures**

## Measures to Safeguard Head Start Children from Abuse & Neglect

The following procedures are established to avoid the possibility of allegations of abuse and neglect towards children:

- As "best practice," Head Start will make every effort to ensure no child is left alone with one adult.
- All service area staff are utilized in the classroom as needed to ensure the required ratio is met and when necessary, children are distributed among other classrooms
- Substitutes must meet Monroe County School Board (MCSB) requirements and pass a background check to substitute as per district policy & procedures.
- Contracted providers will pass level II background screening as per MCSB policy.
- Any classroom volunteers or visitors not meeting level II background screening requirements will not be left alone with student(s). Level 1 background volunteers will remain in supervision of instructional staff and/or Head Start employee(s).

## Monroe County Bylaws & Policies - Reporting Known or Suspected Cases

A. Any person, including teachers, administrators, support personnel, and other District and school personnel who knows, or has reasonable cause to suspect that a child or a student has been abused, abandoned, or neglected by a parent, legal custodian, caregiver, adult, or other person responsible for the child's welfare or that a child is in need of supervision and care and has no parent, legal custodian, or responsible adult relative immediately known and available to provide supervision and care shall report such knowledge or suspicion to the Department

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of Children and Families in a manner prescribed by law. A person who is required to report known or suspected child abuse, abandonment, or neglect and who knowingly and willfully fails to do so, or who knowingly and willfully prevents another person from doing so is guilty of a misdemeanor of the first degree.

Further any person, including teachers, administrators, support personnel, and other District and school personnel, who knows, or has reasonable cause to suspect, that a child or a student is the victim of childhood sexual abuse or the victim of a known or suspected juvenile sexual offender, shall report such knowledge or suspicion to the Department of Children and Families in a manner prescribed by law.

A person who is required to report known or suspected child abuse, abandonment, or neglect and who knowingly and willfully fails to do so, or who knowingly and willfully prevents another person from doing so commits a felony of the third degree.

- B. The proper procedure for reporting known or suspected cases of child abuse, abandonment, and neglect is:
  - 1. Make a report immediately to the Department of Children and Families central abuse hotline, using the single Statewide toll-free telephone number: 1-800-96-ABUSE (1-800-962-2873), or via fax, web-based chat, or web-based report. School employees reporting such cases are required to provide their names to the hotline staff. The names of reporters shall be entered into the record of the report, but shall be held confidential and exempt as provided by law.
  - 2. As soon as practicable after making the report, the school staff member shall inform the principal or supervisor of their knowledge or suspicions, and advise that individual that the report has been made.
  - 3. A notice regarding this reporting requirement shall be posted in a prominent place in each school in the District.
- C. School employees are to be advised that reporting their knowledge or suspicions of suspected abuse to a principal, or supervisor, or other school or District personnel does not comply with the mandatory reporting requirements of the law. The principal, supervisor, and other school or District personnel who are informed of suspected abuse, abandonment, and neglect likewise have an obligation to report to the central abuse hotline as required by law.
- D. No employee of the District shall be subject to reprisal or discharge because of his/her actions in reporting abuse or neglect pursuant to the requirements of F.S. 39.203.
- E. No Board employee may agree, as a condition of receiving information about child abuse, neglect, or abandonment from a victim, a perpetrator, witness, or other person, that the Board employee will not report this information as required by law and this Board policy.

## **False Reports**

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A person who knowingly and willfully makes a false report of child abuse, abandonment, or neglect, or who advises another to make a false report, is guilty of a felony of the third degree and may be subject to other penalties in accordance with Florida law.

F.S. 39.01(47), 39.201, 39.202, 39.203, 39.204, 39.205, 39.206, 39.303, F.S. 1001.41, 1006.061

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## 8462 - CHILD ABUSE OR NEGLECT

In compliance with School Board policy and State statute, instructional staff members are required to report to the proper legal authorities any sign of child abuse or neglect. The child may suffer from physical abuse and neglect, sexual abuse, and/or emotional maltreatment. Basically, physical abuse is the nonaccidental, physical injury of a child; physical neglect is the failure to provide proper parental care, support medical attention, and education for a child; sexual abuse is any indecent sexual activity; and emotional maltreatment is failure to provide warmth, attention, supervision, and/or normal living experiences for a child.

For purposes of this policy, the following definitions shall apply:

- A. "Child abuse or neglect" means harm or threatened harm to a child's physical or mental health or welfare by the acts or omission of a parent, adult household member, or other person responsible for the child's welfare, or for purposes of reporting requirements, by any person.
- B. "Harm" to a child's health or welfare can occur when the parent or other person responsible for the child's welfare:
  - 1. Inflicts, or allows to be inflicted, upon the child physical or mental injury. Such injury includes but is not limited to:
    - a. injury sustained as a result of excessive corporal punishment;
    - b. physical dependency of a newborn infant upon any drug controlled in Schedule I and Schedule II of s. 893.03, with the exception of drugs administered in conjunction with a detoxification program as defined in s. 397.021, or upon drugs administered in conjunction with medically approved treatment procedures; provided that no parent of such a newborn infant shall be subject to criminal investigation solely on the basis of such infant's drug dependency.
  - 2. Commits, or allows to be committed sexual battery against a child or allows to be committed, sexual abuse of a child.
  - 3. Exploits a child, or allows a child to be exploited, as provide in F.S. Chapter 39.

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- 4. Abandons a child.
- 5. Fails to provide the child supervision or guardianship by specific acts or omissions of a serious nature requiring the intervention of the department or the court.
- 6. Fails to supply the child with adequate food, clothing, shelter, or health care, although financially able to do so or although offered financial or other means to do so; however, a parent or other person responsible for the child's welfare legitimately practicing their religious beliefs, who by reason thereof does not provide specified medical treatment for a child, may not be considered abusive or neglectful for that reason alone, but such an exception does not:
  - a. eliminate the requirement that such case be reported to the department;
  - b. prevent the department from investigating such a case; or
  - c. preclude a court from ordering, when the health of the child requires it, the provision of medical services by a physician, or treatment by a duly accredited practitioner who relies solely on spiritual means for healing in accordance with the tenets and practices of a well-recognized church or religious organization; or
- 7. Exposes a child from birth to five (5) years of age to drugs. Exposure to drugs is established by preponderance of evidence that the mother used a controlled substance that is, any drug controlled in Schedule I or Schedule II of s. 893.03, during pregnancy or that the parent or parents demonstrate continued chronic and severe use of a controlled substance and as a result of such exposure the child exhibits any of the following:
  - a. abnormal growth
  - b. abnormal neurological patterns
  - c. abnormal behavior problems
  - d. abnormal cognitive development
- C. "Department" means the Florida Department of Children and Families.

## A child who is being abused may also:

- A. be hyperactive;
- B. act fearful of adults;
- C. cling to adults;
- D. be anxious, tense, and nervous.

#### **Suspected Abuse/Neglect by Parents**

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Parents who are abusing their child may:

- A. be reluctant to give information;
- B. describe a story that doesn't fit the injury;
- C. have an inappropriate reaction to severity of injury;
- D. express unreasonable expectations for child's performance;
- E. claim conditions that do not exist, e.g.

"S/He bruises easily."

"S/He moves constantly." (Child sits quietly.)

F. indicate family problems such as marital discord, crowding, financial stress, psychological disorders, retardation, alcohol or drug addiction, etc.

#### Children in Need of Services

In accordance with law, a child is in need of services, if before s/he is eighteen (18) years of age, one of the following conditions exist and the child needs care, treatment, or rehabilitation that the child:

- -- is not receiving and
- -- is unlikely to be provided or accepted without the coercive intervention of the court.
- A. The child's physical or mental condition is seriously impaired or seriously endangered as a result of the inability, refusal, or neglect of the child's parents, guardian, or custodian to supply the child with necessary food, clothing, shelter, medical care, education, or supervision.
- B. The child's physical or mental health is seriously endangered due to injury by the act or omission of the child's parent, guardian, or custodian.
- C. The child is the victim of a sex offense under State law.
- D. The child's parent, guardian, or custodian allows the child to participate in an obscene performance (as defined by State law).
- E. The child's parent, guardian, or custodian allows the child to commit a sex offense prohibited by State law.
- F. The child substantially endangers the child's own health or the health of another individual.
- G. The child's parent, guardian, or custodian fails to participate in disciplinary proceeding in connection with the student's improper behavior, as provided for by State law, if the behavior

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of the student has been repeatedly disruptive in the school.

- H. The child is a missing child (as defined in State law).
- I. The child is deprived of nutrition that is necessary to sustain life or is deprived of medical or surgical intervention that is necessary to remedy or ameliorate a life threatening medical condition; if the nutrition, medical, or surgical intervention is generally provided to similarly situated children with or without disabilities.
- J. If a parent, guardian, or custodian fails to provide specific medical treatment for a child because of the legitimate and genuine practice of the religious beliefs of the parent, guardian, or custodian, a rebuttable presumption arises that the child is not a child in need of services because of the failure. However, this presumption does not do any of the following:
  - 1. prevent a juvenile court from ordering, when the health of a child requires, medical services from a physician licensed to practice medicine in Florida
  - 2. apply to situations in which the life or health of a child is in serious danger
  - 3. limit the right of a parent, guardian, or custodian of a child to use reasonable corporal punishment when disciplining the child
  - 4. limit the lawful practice or teaching of religious beliefs

#### **Procedure for Reporting**

Any employee or agent of the District School Board who knows, or has reason to suspect, that a child is abused, abandoned, or neglected by a parent, legal custodian, caregiver, or other person responsible for the child's welfare, has an affirmative duty to report any actual or suspected case to the Department of Children and Families central abuse hotline 1-800-96-ABUSE (1-800-962-2873.) The law provides protection for the reporting staff member. All staff members are to report their concerns to the student's principal, but still maintain the obligation to assure that the report is made to the abuse hotline. The staff member is not relieved of the obligation to report to one of the above agencies unless a report has already been filed to the best of the individual's belief. A person who is required to report known or suspected child abuse, abandonment, or neglect and who knowingly and willfully fails to do so, or who knowingly and willfully prevents another person from doing so is guilty of a misdemeanor of the first degree F.S. Chapter 39.

It is the responsibility of the Children's Protection Service to investigate possible abuse and/or neglect and prepare a written report within forty-eight (48) hours. School personnel should not pressure the child to divulge information regarding any injury or other circumstances surrounding the abuse and/or neglect. The school need not provide that abuse and/or neglect exists before reporting. They need only suspect that abuse and/or neglect has or is currently occurring.

#### **Investigation of Child Abuse or Neglect**

Investigators who seek to interview a student who is a suspected victim of abuse or neglect must make the

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request to the principal who shall determine from the investigator whether or not it is appropriate to notify the student's parents. If it is appropriate, the principal should notify the parents of the time and place of the impending interview.

## **Suspected Abuse by Staff Members**

If a staff member is suspected of abuse, his/her supervisor should be notified immediately and the matter kept in strict confidence by the reporting person. The supervisor shall follow the District's due-process procedures for dealing with an employee's real or alleged violation of any law or District policy. This procedure does not negate the requirement for the reporting person to report the suspected abuse to the abuse hotline. Referrals to other agencies (i.e., law enforcement) will be made at that level. Head Start staff has additional procedures and safeguards when reporting as noted below.

#### Reports of Suspected Abuse or Neglect Involving Head Start Children

 All employees of Head Start by law are mandated reporters of known or suspected incidents of child abuse, neglect, or abandonment. Employees are expected to report all known or suspected incidents of child abuse, neglect, or abandonment to the Abuse Registry in accordance with Florida Statutes 39.201. Reports must be made <u>immediately</u> to 1-800-96-Abuse or 1-800-962-2873. As of 10/1/2012, the penalty for those who suspect a child is being abused, but fail to report is a felony.

NOTE: The Head Start employee who has direct knowledge of the suspected abuse or neglect MUST make the call or report on-line to the Abuse Registry. The employee's supervisor will not make the call because it must be first-hand information.

2. If there is a question as to whether the incident constitutes suspected abuse or neglect, the employee must make the report and let the Abuse Registry make the determination.

Note: If the counselor from the Abuse Registry states that they are not going to accept the report, employees must document the counselors name or ID and document their comments.

3. All calls made to the Abuse Registry are confidential but must be made on approved forms to inform Head Start Leadership/Management and Administration. Reporter information is not released to anyone other than the Department of Children and Families (DCF) and law enforcement. Since

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employees are mandated reporters they are required to give their name when making a report to the Abuse Registry. Any person, when acting in good faith, is immune from liability in accordance with Florida Statutes 39.203(1)(a).

4. Employees who report suspected child abuse or neglect to DCF must complete a HS Child Abuse/Neglect Referral form (see attached). The form must be filled out in its entirety describing the details of the alleged abuse or neglect and the proof that a call was made to the Abuse Registry. The HS Child Abuse/Neglect Referral form must be communicated to HS Leadership/Management Team and E.C. Coordinator/Supervisor. Copies of the HS's Child Abuse/ Neglect Referral form are filed in a confidential file at the Head Start center and Administrative Office.

Note: If an incident involves more than one child, a separate HS Child Abuse/Neglect Referral form is completed on each child directly involved ensuring confidentiality.

- 5. A member of the HS staff will distribute copies of the HS Child Abuse/Neglect Referral form to the appropriate parties involved to ensure that school level administration and HS Leadership/Management are informed.
- 6. Upon completion of the investigation by DCF, the recipient of the information will inform his/her immediate supervisor and E.C. Coordinator/Supervisor of the outcome.

## Reports of Suspected Abuse or Neglect Involving Staff/Volunteers/Contracted Providers

- 1. Once informed of the suspected abuse or neglect, an investigation will begin immediately at the school level. A representative from the Head Start Leadership/Management Team will be notified.
- 2. The HS's Child Abuse/Neglect Referral form is forwarded to E.C. Coordinator/Supervisor.
- 3. Any employee who is the subject of a reported case of abuse or neglect must be removed from contact with children during the state investigation until the charge is fully resolved. MCSB due process will be followed.

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Note: If the counselor from the Abuse Registry states that they are not going to accept the report, employees must document the counselors name or ID and document their comments.

- 4. Within twenty-four to forty-eight(24 48) hours the Principal or designee will interview the involved parties, document, and inform Human Resources and the District's office of Teaching and Learning.
- 5. Staff removed from their assigned classroom/center during the investigation process may be reassigned with pay by management to an area that does not involve contact with children.
- 6. If the suspected abuse or neglect involves volunteers or contracted providers, they will be asked to discontinue their service until completion of the investigation.
- 7. At the conclusion of the investigation if the result is invalid or unfounded no corrective action is necessary.
- 8. If the result is valid, administration will follow MCSB due process, which may result in a reprimand, termination, or other.
- 9. As mandated reporters, staff members working for Head Start programs are legally obligated to report suspected child abuse or neglect to the appropriate state child protection agency.
- 10. Head Start Programs and individuals must not attempt to investigate; to do so can jeopardize the accuracy of the official investigation.
- 11. As a Head Start grantee, the E.C. Coordinator will notify the program's Regional Office immediately when a staff member or volunteer causes an incident or suspected incident and the case is accepted to be investigated by the state agency.

## Child Abuse Training

- 1. Parents are informed at the time of enrollment and during orientation of the child abuse policy and the mandated reporting requirements of Florida Statutes 39.201.
- 2. During new staff orientation, training is provided on the Head Start Child

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Abuse Reporting Procedures.

- 3. All staff receives a copy of the Child Abuse Policies and Procedures and must sign to acknowledge reporting requirements.
- 4. Annual child abuse training is provided for all Head Start staff.
- 5. The Policy Council receives training on the Head Start Child Abuse Policies and Procedures annually.

#### **REGULATION REFERENCE:**

1302.92 (a)(b)(1-5) Training and Professional Development

## **POLICY**:

It is the policy of MCSD Head Start program to provide all new staff, consultants, and volunteers an orientation that focuses on, at a minimum, the goals and underlying philosophy of the program and on the ways, they are implemented.

It is the policy of MCSD Head Start program to ensure that professional development opportunities are made available to employees so that they can fulfill the requirements of their position.

## **PROCEDURE:** (Grantee)

- 1. Staff training will include, but not limited to the following:
  - a. An overview of the program.
  - b. An explanation of Head Start Policies and Procedures.
  - c. Overview of Head Start Performance Standards.
  - d. Overview of the goals, objectives, and philosophy statement of the Head Start/Early Head Start program and MCSD.
- 2. **Grantee newly hired** staff, consultants and volunteers must sign and date all required forms for the Head Start program such as "Code of Ethics," Child Abuse and Neglect Reporting Requirement Acknowledgement Form, and any other documentation required by Federal, State, and Local rules and regulations.
- 3. **Training -** is an important part of Monroe County School District, training courses are announced at each school and in professional development database. If a course is provided by the school district or if the county is paying for the cost, the department Manager, Principal, or Head Start Director may approve employees to attend. Should staff successfully complete educational courses or other training, a copy of the course

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certificate should be submitted to the Education Manager and the PD contact at each school, so it will be added to staff's personnel file/electronic database.

- 4. Head Start requires that at least one (1) staff member per classroom receives the above stated **First Aid and CPR** certifications. Certificates of course completion are valid based on timeframes established by each First Aid and CPR training program, not to exceed two (2) years.
- 5. Special courses are offered to staff, as necessary. Various professional develop will also be offered at a minimum of 4 times a school year and made available to employees desiring to improve their skills, knowledge, and job performance. In addition, training is offered on-line.
- 6. Completion of a minimum of 15 clock hours of professional development training per year. For teaching staff, such professional development must meet the requirements described in section 648 (a)(5) of the Act.
  - a. Pre-service training at the beginning of each school year is mandated as well as professional development days built into the school calendar. Training will include but is not limited to orientation to the program expectations, curriculum, assessment and screenings, progress monitoring and data, CLASS, health and safety, abuse and neglect, and multi-tiered system of support.
  - b. A calendar will be provided to teachers and paraprofessionals at pre-service indicating required professional development participation. (\*calendar may be updated based on program needs)
- 7. MCSDHS requires child abuse trainings be provided annually for all staff.
- 8. Education staff will be observed using the CLASS observation tool three times per year to identify strengths and areas of needed support. Research based coaching will be provided using a tiered approach depending on specific need. Lead teachers will complete a professional growth plan annually including a student related goal and a professional development goal.
- 9. Training on methods to handle suspected or known child abuse and neglect cases that comply with applicable federal, state, local, and tribal laws per year. Child Abuse Trainings **must** be completed annually and 30 days after hire date.
- 10. Training for child and family services on best practices for implementing family engagement strategies in a systemic way;
- 11. Training for child and family services staff, including staff that work on family services, health, and disabilities, that builds their knowledge, experience, and competencies to improve child and family outcomes;
- 12. Provide research-based approaches to professional development for education staff that

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are focused on effective curricula implementation and knowledge of the content.

- 13. Workshops and other trainings will be conducted by staff, local, and out of town presenters based on their knowledge and expertise within a specific area of training. Workshop topics will be based on the program's training needs assessment results, community assessment findings, internal and external monitoring findings, observations, training and technical assistance plan, parent surveys, Head Start/Early Head Start Performance Standards, and Federal, State, and Local training requirements.
- 14. Head Start requires that at least one (1) staff member per classroom receives the above stated First Aid and CPR Certifications. Certificates of course completion are valid based on the timeframes established by each First Aid and CPR training program, not to exceed two (2) years.
- 15. A staff evaluation will be completed annually based on the Professional Growth Plan, CLASS Observations, and student data.

#### **Tuition Refund Program**

Staff may apply to T.E.A.C.H. scholarship for additional funding of a higher degree. The MCSDHS grant abides by this contract, allows release time, and gives increased salary upon completion of higher degree.

Successful completion is defined as a "C" grade in an undergraduate course and a "B" in a graduate course.

An employee who participates in the scholarship program will be obligated to remain in the Head Start program or school district for a minimum of one (1) year after completion of coursework. Should the employee terminate prior to the expiration of this period he/she will reimburse the district according to expenses incurred by the district/program for release time and other related expenses.

\*These procedures are documented by the Education Manager and will be evaluated as part of the Self-Assessment

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1302.93 Staff health and wellness. 1302.94 Volunteers

#### POLICY:

It is the policy of Monroe County School District Head Start Program to ensure that all staff have an initial health examination that includes screening for tuberculosis, and a periodic reexamination, as recommended by the health care provider or as mandated by State, Tribal, or local laws. The purpose of this screening is to ensure that staff does not, because of communicable diseases, pose a significant threat to the health or safety of others in the Program.

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#### **PROCEDURES:**

#### Staff Health Procedures:

- 1. Prior to hiring, all Grantee, Delegate Agency, and Early Child Care Partners staff is given an initial physical examination that includes drug and tuberculosis (PPD) testing. Delegate agencies have 90 days after the initial hire day to conduct an initial physical examination. The results of the examination, tuberculosis test (or chest x-ray) and drug test must be received prior to being hired and 90 days after initial hire date.
- 2. All Temporary employees are given an initial physical examination that includes drug and tuberculosis (PPD) testing. The results of the examination, tuberculosis test (or x-ray) and drug test must be received prior to being hired.
- 3. All Messenger and/or Driver Attendants are required to take a physical examination, including random drug testing every year. The County, via the MCSD Personnel Technician, schedules these examinations.

Every two (2) years, Grantee, Delegate Agency, and Early Child Care Partners staff is also required to provide an updated physical examination and tuberculosis test from a licensed medical provider. Chest x-rays are required every five (5) years for staff whose tuberculosis test is positive. The test results for both the physical and tuberculosis test must confirm that the employee is in good health and free of communicable diseases. Updated letters will be sent 60 days in advance to the employee needing updated physical examination.

- 1. MCSD Head Start will be responsible in ensuring the review the health records (in accordance with the requirements) of staff on an on-going basis to ensure that the health requirements are met.
- 2. A copy of the health requirement verification will be submitted to the Human Resources Department for maintenance and an original copy will be kept on file with the HS nurse. All health files must be kept in a separate file and secured in accordance with HIPPA law. At the beginning of each school year, MCSDHS nurse will ensure that Grantee, Delegate Agency, and Early Child Care Partnership staff has a current physical exam, which includes tuberculosis screening or a chest x-ray.
- 3. After completing the physical and/or tuberculosis test(s), the employee will submit the results to his/her supervisor. The supervisor will forward the original copy of the results to the Head Start/EHS Human Resources Unit and a copy will be sent to the district's Human Resources Generalist for logging and filing. In addition, a copy of the results will be maintained at the center of employment and placed in the employee's file. The HS Manager must also record results in Child Plus, including updated examinations.
- 4. The Head Start nurse will be responsible for notifying staff person(s) when physical examinations and/or tuberculosis tests are about to expire. The memo will be sent out

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approximately ninety (90) days prior to the expiration date of the physical and/or tine test. It will state that an appointment with a medical provider is required and the results of the test(s) submitted by the expiration date. In addition, a copy of the memo will be sent to the employee's supervisor.

- 5. Failure to submit the required documentation in a timely manner is in violation of Head Start/Early Head Start Policies and Procedures and could result in progressive disciplinary action.
- 6. These policies and procedures of staff health for the delegates and contractor sites will be evaluated at least annually as part of self-assessment.

#### Volunteer Health Procedures:

- a) Volunteers participating in the class on a regular basis must complete the volunteer training and background check in accordance with Monroe County School District.
- b) Volunteers participating in the class on a regular basis must have been appropriately screened for communicable diseases.
- c) Volunteers are not to be left alone with children.
- d) Regular Volunteers must be screened for appropriate communicable diseases in accordance with state, tribal or local law.
- e) In the absence of state, tribal or local law, the Health Services Advisory Committee must be consulted regarding the need for such screening agencies will be responsible for collaborating with community health agencies that provide physical examinations for employment.

<u>Health and Wellness:</u> Health and wellness information will be made available to staff and volunteers. This information may be in a form of brochures, letters, memorandums, pamphlets, email notices, or through employer provided services. Health and wellness information may also be shared at the Health Advisory Committee meetings.

#### **ATTACHMENT(S):**

Health Examination Form

\*These procedures will be evaluated as part of the Grantee and Delegate Self-Assessment

#### **REGULATION REFERENCE:**

Performance Evaluation and Guidance for Reporting

#### **POLICY:**

Monroe County School District Head Start follows the following MCSD Human Recourses Department guidelines for annual evaluations and other HR documentation.

## **PROCEDURES:**

Line of the Control o	Monroe County School District Head Start Program Standard Operating Procedures/Plans
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	Timeline
All new hires will receive a new hire binder from HR	Within 30 days of hire date
All Head Start Teachers will receive a job description detailing their duties.	Within 30 days of School
Teachers must return their signed copy of the job description	Within 5 days of receipt of contract
Advertise supplemental positions	Pre-planning
Provide a copy of the Code of Conduct dealing with student behavior available to all instructional personnel and review the code at a faculty meeting during pre-planning.	Pre-planning
Conduct an orientation program for new instructional staff	Pre-planning
Formulate supervision plan with the building planning team and report in writing to the Director a plan for additional school supervision to be used when necessary.	
Annual Acknowledgment forms will be auto-generated in Focus Employee Self Service Portal.	Each employee's work
	anniversary
Supplements beginning in the first semester shall be paid in equal payments over the school	Sept
year (UTM Article XXX: Section 2)	
Certification review and Out of Field Reporting with instructor acknowledgment letters and notice to Director	Sept
School Board meeting – Waiver Request - Out of Field Reporting to Regional	Sept

Teachers who are newly hired to the district must be observed and evaluated twice during	their	Dec.
first year of teaching in the school district. One (1) observation and evaluation sha	all be	
completed within ninety (90) days of the teachers first duty day and the second observation	n	
and evaluation shall be completed prior to April 15.		

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1st Teacher Observation (New and Beg.) must be completed ("Teachers who are "newly hired" for their first year of teaching in the district shall be informed of accumulated evaluation data by the end of the first eighteen (18) weeks of school and before April 15.  A post observation conference with the teacher is required within seven (7) working days following any formal observation. This data shall include at least one (1) classroom observation. Two conferences will be held; one at the end of the first 18 weeks of school and one by April 15th; observation and evaluation data that have been completed will be reviewed at these conferences. A teacher may be entitled to Union representation if he/she so desires. At the conference, if the principal has reason to believe that the teacher's reappointment is in question; the Education Manager or Principal shall give the employee recommendations for improvement in writing."	
Acknowledgment(s) of Intent to Remain [Jan 16 to Jan 19]	Jan.
Supplements beginning in the second semester shall be paid in equal payments for the remaining paychecks following the first semester	Jan.
Start of Grant staffing pattern	Feb.
Instructional Recommendations go out to Principals	Feb.
Administrative Recommendations go out to Executive Staff/Dept. Heads	Mar.
Subject or Grade Preference Sheets distributed to teachers	Mar.
Return Teacher Recommendations to HR	Mar.
Instructional staff applications for transfers must be submitted in MCSD electronic database.	Apr.
HR shall notify employees on leave in writing (to include email to a personal email address provided by the employee) of their obligation to provide written notice of their intent to return. Said notice to include "return/receipt".	Apr.
2 <sup>nd</sup> Teacher Observation (AC-1) and Evaluation must be completed	Jan./Feb.
School Related Personnel Evaluations must be completed	Apr.
Other/Non-Instr./Non-Admin recommendations for release to HR for approval	Apr.
Administrative Recommendations to HR	Apr.
AC teachers not recommended for reappointment must be told in writing by the end of the school year.	May
Superintendent makes his recommendations for reappointment by (no later than 4 weeks prior to the teachers' last day of post planning)	5/8
Instructional staff, who have been employed for three (3) consecutive years or more, shall be granted a year's leave of absence for one year for the upcoming school year when the request has been made.	5/1
Employees that had been granted a 1-year leave shall provide the required written notice of their intent to return to	5/1

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Administrators not recommended to return must be told in writing by	5/4
Other/Non-Admin not recommended to return must be told writing by	5/4/18
Teacher Appreciation Week	May
School Board Meeting to approve all recommendations for renewal & non-renewal	May
Non-renewed AC Teachers Rehire Eligibility List will be circulated by HR	May
Copy letters of non-renewal for Teachers and Administrators to be received to HR	May
Tentative Program Assignment to Teachers (no later than 8 days prior to the last day for teachers)	May
Evaluations must be given to teachers by (prior to the last 5 working days of the school year)	5/31/17
Tentative Building Assignments to Teachers (no later than 5 days before the last day for teachers)	
Last Day for Teachers	May/June
Administrative Contracts go out to administrators (30 days after School Board approval)	June
Administrative Contract to be returned to HR (date Principal's Mtg before Summer)	June
Evaluations due to HR for Support Staff – Non UTM & Non Instructional	June

Head Start Act Section 648A (f).

# **POLICY**:

It is the policy of Monroe County School District Head Start Program to create, in

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consultation with the employee, a professional development plan for all full-time Head Start employees who provide direct services to children and shall ensure that such plans are regularly evaluated for their impact on teacher and staff effectiveness. The Program and employee shall implement the plan to the extent feasible and practicable.

#### **PROCEDURES**:

- 1. All teachers who provide direct services to children will be required to complete a Professional Growth Plan, yearly.
  - A. Paraprofessionals or CDA Support staff are required to fill out a PD plan/document professional development annually and complete with their evaluation.
- 2. The immediate supervisor will review the Plan with the subordinate in detail. Afterwards, both the supervisor and employee will sign the Professional Growth Plan.
- 3. As each form is completed, the supervisor will ensure that the following distribution process is adhered to:
  - A. That it is documented in "My Learning Plan," and a copy is maintained by Ed. Mgr.
- 4. Supervisors will monitor the progress of their staff throughout the Performance Evaluation review. The Training and Improvement of Skills and Professional Competencies form should be used to document all training needs *or* to track the employee's annual progress towards meeting the needs identified in their Professional Growth Plan.
- 5. The grantee uses the MCSD (Educational, Performance, Incentive, Compensation) EPIC evaluation plan for teacher evaluations as follows:
  - A. The 3 CLASS observations are averaged and final average is used to determine scoring on the Teacher instrument according to the CLASS & Charlotte Danielson Crosswalk. If there is more than one area on the crosswalk, the score is averaged.
  - B. PGP goals if all goals are met a 3 is given, if one is met a 2 is given, if neither goal is met a 1 is given. PGP Goals consist of
    - i. one inquiry question to answer using student data
    - ii. an individualized CLASS tool focus area for improvement
  - C. Student Performance A Snapshot report from Teaching Strategies Gold to determine the percentage of students that meet or exceed the expectation. TSG includes all children rather than VPK that only targets those with a certificate.
  - D. The domains on the evaluation form are weighted different than the district EPIC tool.

## ATTACHMENT(S):

**EPIC Plan and Evaluation Forms** 

\*Evaluation procedures are implemented and monitored by the HS Director and recorded and filed in the FileBound technology based filing system by the Human Resource Department upon completion.

## **REGULATION REFERENCE:**

Head Start Act Section 640

Allotment of Funds: Limitation on Assistance

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<u>Policy:</u> —A program must provide management and a process of ongoing monitoring and continuous improvement for achieving program goals that ensures child safety and the delivery of effective, high-quality program services.

## **Procedures:**

#### Family Service Staff (Site Coordinator)

- 1. Each Site Coordinators that is highly effective or effective has an opportunity to receive \$600 to \$300 incentive pay bonus at the end of each school year, as the grant allows.
- 2. Each Site Coordinators is informed of opportunity and is provided written guidelines (see attached PFCE Incentive Pay Rubric).
- 3. Family Service Manager will review Child Plus Reports, PFCE Goal Assessment and Partnership Plans, Sign in sheets, Minutes, Parent Engagement /Involvement Activity Record, Community Engagement/Involvement Activity Record, Training Log/Binder, Recruitment Log, Parent Survey, Hallmark Form and or Family Service Manger Reports to determine who is eligible for the bonus.
- 4. Family Service Manager will submit to Director, the Monroe County Public Schools Head Start Program Rubric for Site Coordinator PFCE incentive pay form for each site coordinator before the end of that budget year term (early June).

<sup>\*</sup>These procedures are monitored by Family Service Manager and Director annually as part of self-assessment.