	Monroe County School District Head Start Program Standard Operating Procedures/Plans
Program Performance Standards and Other Regulations	Subject: Program Operations Subpart J –Program Management and Quality Improvement
Effective Date: August 16, 2017	Revision Date:

AUTHORITY:

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

REFERENCE:

Head Start Program Performance Standards -Program Management and Quality Improvement
45 CFR Part(s): 1302.100-1302.101(a)(b)

POLICY:

It is the policy of Monroe County School District Head Start Program to implement and utilize a management, which will include 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:

Management system

1. An organizational structure will be maintained that supports the accomplishment of program objectives and addresses the major functions and responsibilities assigned to the Head Start director, the fiscal manager, and the human resources department. Additionally, program management functions will be formally assigned to content area staff with expertise in early childhood development, health, nutrition, child mental health, disabilities, and family and community engagement.
 - a) The Head Start director, in collaboration with the Head Start Manager and assistance from HR Department as requested, will ensure that regular and ongoing employee supervision is provided which supports individual staff professional development and continuous program quality improvement.
 - b) The Head Start director, in collaboration with the fiscal manager and the Leadership/Management Team, will ensure that budget and staffing patterns that promote continuity of care for all children enrolled, allow sufficient time for staff to participate in appropriate training and professional development, and allow for provision of the full range of services as required.

The program will maintain the Head Start Enterprise System automated system and the ChildPlus database record keeping systems to ensure effective oversight of program expenditures and service provision and information reporting. Electronic back-ups are maintained by Monroe County School District Instructional Technology Department.

Each database maintains electronic records according to current industry security standards. Policy and procedures regarding data entry, data collection and data sharing


	Monroe County School District Head Start Program Standard Operating Procedures/Plans
Program Performance Standards and Other Regulations	Subject: Program Operations Subpart J –Program Management and Quality Improvement
Effective Date: August 16, 2017	Revision Date:

are located in the respective service area.

Automated Record Keeping Systems

- **ChildPlus** is the program management web based software used by MCSD Head Start. Records of all staff, enrolled children and their families are entered into the ChildPlus database. ChildPlus data is used to complete the annual Program Information Report (PIR), enrollment/attendance reports to federal officials, as well as data sharing.
- **Teaching Strategies Gold Online** is the web based software application designed to assess or test student learning and/or assist in planning, implementing, or reporting on courses of study, lessons, assignments, or other learning activities. TSG on-line data and reports are helpful tools to the on-going monitoring processes that are completed on-site and by remote desktop reviews.
- **Devereux Early Childhood Assessment (DECA)** is the screening tool, utilized that identifies the strengths and comparative weaknesses of protective factors for infants and toddlers.
- **Ages and Stages Questionnaire (ASQ-3) and the Ages and Stages Social and Emotional Screener (ASQ: SE-2)** are the program management web based software applications used by Miami Dade County as well as Child Care Partnerships as the developmental screening for infants and toddlers.

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

	Monroe County School District Head Start Program Standard Operating Procedures/Plans
Program Performance Standards and Other Regulations	Subject: Program Operations Subpart J –Program Management and Quality Improvement
Effective Date: August 16, 2017	Revision Date:

REFERENCE:


Head Start Program Performance Standards- Program Management and Quality Improvement
45 CFR Part(s): 1302.102 (a)

POLICY:

It is the policy of Monroe County School District Head Start Program to utilize the programs data in the planning process of establishing program goals and objectives in collaboration with the governing bodies and measuring achievement of established goals and objectives. There will be a continual process of monitoring to evaluate progress towards program and school readiness goals.


PROCEDURES:

1. MCSDHS Head Start program will engage in a continuous cycle of planning and program improvement.
2. The planning process rests on the collection and analysis of data.
3. The Community Assessment, program Self-Assessment and child and family outcomes data will be collected and analyzed by the grantee management team.
 - a. Community Assessment data will be utilized to drive planning for selection criteria, service locations and program delivery options.
 - b. Self-Assessment encompasses community assessment, ongoing monitoring, child outcomes, family outcomes and Classroom Assessment Scoring System (CLASS) data.
4. The program, in collaboration with the governing body and policy council, will establish goals and measurable objectives based on analyzed data that will include:
 - a) Strategic long-term goals for ensuring the program remains responsive to community needs as identified in the community assessment.
 - b) Professional Development of governing bodies, program staff and parents on subject matters that constitutes goals, objectives, and activities, along with training on how to measure progress in effort (outputs) and effect (outcomes).
 - c) School readiness goals will be aligned with the Head Start Early Learning Outcomes Framework: Ages Birth to Five, state and tribal early learning standards, as appropriate, and requirements and expectations of schools Head Start children will attend, per the requirements of subpart B of part 1304.
 - d) Effective health and safety practices which will ensure that children are safe at all times.

	Monroe County School District Head Start Program Standard Operating Procedures/Plans
Program Performance Standards and Other Regulations	Subject: Program Operations Subpart J –Program Management and Quality Improvement
Effective Date: August 16, 2017	Revision Date:

5. Written improvement plans, revisions of long and short-range goals and objectives for program operations are developed annually in conjunction with delegates and child care partners.
6. Program goals will be reviewed, revised and reestablished on an ongoing basis.

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	Monroe County School District Head Start Program Standard Operating Procedures/Plans
Program Performance Standards and Other Regulations	Subject: Program Operations Subpart J –Program Management and Quality Improvement
Effective Date: August 16, 2017	Revision Date:

REFERENCE:

Head Start Program Performance Standards -Program Management and Quality Improvement 45 CFR Part(s): 1302.102 (b)(1)(i)


POLICY:

It is the policy of Monroe County School District Head Start Program to establish and implement a system of ongoing oversight. This will ensure effective implementation of the program performance standards, including ensuring child safety, and other applicable federal regulations. Monitoring protocols will be established across the program to include internal monitoring processes for grantee and sites.

PROCEDURES:

1. The program will collect and use data to continuously evaluate progress toward program goals and objectives. MCSDHS will review data gathered through the ongoing monitoring system which will include a review of electronic data and related information as previously noted. Effective ongoing monitoring will take place at all program levels to enable agencies to track progress toward their goals and objectives and ensure compliance.
2. MCSDHS's staff will ensure effective ongoing program oversight and correction. Management staff will establish and implement a system of ongoing oversight that ensure effective implementation of the program Performance Standards including child safety and all applicable federal regulations. Site/school service area and related personnel, will receive training and ongoing technical assistance to comply with the implementation of the Performance Standards in all related service areas on a monthly, and quarterly basis as well as needed

*These procedures will be monitored monthly.

	Monroe County School District Head Start Program Standard Operating Procedures/Plans
Program Performance Standards and Other Regulations	Subject: Program Operations Subpart J –Program Management and Quality Improvement
Effective Date: August 16, 2017	Revision Date:

REFERENCE:

Head Start Program Performance Standards- Program Management and Quality Improvement 45 CFR Part(s):1302.102 (b)(1)(ii)


POLICY:

It is the policy of the Monroe County School District Head Start Program to implement an effective system of ongoing monitoring which will identify and correct quality and compliance issues immediately, or as quickly as possible.


PROCEDURES:

MCSDHS's Quality Assurance


1. Managers will monitor content areas monthly and report through Leadership reports to team and director and monthly meetings.
2. Service area and program area managers will also conduct continuous quality improvement activities utilizing a coaching, mentoring and technical assistance model to ensure that program objectives are being met and the necessary corrections are made in a timely manner. Collaborative planning and training activities will be implemented on an ongoing basis between the Director and service area managers.
3. Procedures will be further developed to ensure that sites are trained and are engaged in monitoring activities at their respective agencies with a focus on the provision of high quality services for children, families, and communities.
 - a. In preparation for conducting site/school monitoring visits, a schedule will be developed which will include an Environmental Health and Safety monitoring event at the beginning of the program year for each site/school. Additional events may be scheduled as deemed necessary throughout the year, and may be unannounced. Grantee Managers will review the following:
 - a. Facilities
 - b. Classrooms
 - c. Playgrounds and outdoor environments
 - d. Health and safety practices
3. Transportation
4. The monitoring schedule will include an annual content area monitoring event for each site/school. Additional events may be scheduled as deemed necessary throughout the year, and may be unannounced. Grantee Leadership Team will review the following:

	Monroe County School District Head Start Program Standard Operating Procedures/Plans
Program Performance Standards and Other Regulations	Subject: Program Operations Subpart J –Program Management and Quality Improvement
Effective Date: August 16, 2017	Revision Date:

- a. Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA)
 - b. Education and Child Development Services
 - c. Health Program Services Including Medical and Oral Health, Child Nutrition, and Child Mental Health and Social and Emotional Well Being
 - d. Family and Community Engagement
 - e. Education and Early Childhood Development
 - f. Services for Children with Disabilities
8. The monitoring schedule will also include an annual Program Design and Governance monitoring event for each site/school. Grantee Leadership/Management team and Director will review the following:
 - a. Program Governance
 - b. Management systems and procedures
 - c. Human Resources Management
9. The monitoring schedule will include an annual Fiscal Integrity monitoring event at the district level. The MCSD Finance Department and other partners will review financial and accounting documents.
10. Service area managers will also use training, technical assistance and coaching data as well as conduct an ongoing review of relevant electronic data as noted to ensure that program goals and objectives are being met.
11. Grantee Managers must display county identification at all times during an onsite monitoring visit.
12. Grantee Managers will review at a minimum percentage of site/school records and classrooms, as determined by MCSDHS's Content Area Manager, and use various methods to review the quality and adequacy of operations and services delivered by each delegate and child care partner agency.
 - a. Personnel File Review: Grantee Managers or designee will review personnel files to ensure staff credentials and all required documentation are current, as mandated by program requirements. Grantee Managers must sign each file's access log.
 - b. Children's File Review: Grantee Managers or designee will review children's files to verify that services have been provided and that the appropriate documentation is in compliance with all applicable regulations and record-keeping practices. Grantee Managers must sign each file's access log.
 - c. Document Review: Grantee Managers or designee will review agencies' attendance logs, invoices, policy and procedure manuals, internal monitoring documentation and other pertinent documents relevant to the monitoring being conducted.

	Monroe County School District Head Start Program Standard Operating Procedures/Plans
Program Performance Standards and Other Regulations	Subject: Program Operations Subpart J –Program Management and Quality Improvement
Effective Date: August 16, 2017	Revision Date:

- d. Site Inspection: Grantee Managers or designee will assess facilities, classrooms, and playgrounds to ensure safe environments are being provided for staff and children, in compliance with applicable regulations.
 - e. Classroom Observation: Grantee certified CLASS observers will conduct classroom observations to ensure the physical environment, curriculum, and learning approach supports each child's individual pattern of development and learning.
 - f. Interview: Grantee Managers will conduct on-site interviews with appropriate agency staff and/or parents as deemed necessary.
 - g. Desktop Monitoring: Grantee Managers will review database reports to monitor services to children and families.
13. Grantee Managers will record all observations and data collected during the monitoring visits on the appropriate monitoring tool(s) and/or checklists.
 14. Grantee Managers will take photographs or make copies of relevant documents to support any non-compliance findings, concerns, or recommendations on internal corrective action form.
 15. Grantee Managers will document site/school strengths, non-compliance findings, concerns, and pertinent observations on the Summary of On-Site Review.
 16. Grantee Managers will conduct an exit meeting at the conclusion of an on-site monitoring review with the site/school Head Start Director, or principal, or appropriate personnel to discuss results and clarify any concerns.
 17. Grantee Managers will document all monitoring results and report all relevant documents and photographs at the monthly Leadership/Management Team meeting.
 18. MCSDHS's Director may make any changes necessary to finalize the monitoring report and share with the team.
 19. Follow-up will occur each month at team meetings until concern/required improvement is completed.
 20. Policy Council and the Monroe County School board will monitor the following through a Head Start update: meals, enrollment, disabilities, fiscal reports, and other data as necessary.
 21. Grantee Managers will file all monitoring tools, checklists, documents, and reports used during the monitoring process at a central location.
- *These procedures will be evaluated as part of the Grantee and Delegate Self-Assessment

	Monroe County School District Head Start Program Standard Operating Procedures/Plans
Program Performance Standards and Other Regulations	Subject: Program Operations Subpart J –Program Management and Quality Improvement
Effective Date: August 16, 2017	Revision Date:

REFERENCE:


Head Start Program Performance Standards- Program Management and Quality Improvement 45 CFR Part(s): 1302.102 (b)(1)(iii)

POLICY:

It is the policy of Monroe County School District Head Start Program to work with the governing board and policy council to address issues during the ongoing oversight and correction process and during federal review oversight.

PROCEDURES:

1. Monthly updates are provided to the board.
 - Each month fiscal is reported.
 - At a minimum of 3 times a year school readiness data is shared.
 - The Planning Process reports are shared: community assessment and/or update, self-assessment, and other reports as requested or necessary.
2. Program leadership will ensure that the governing body and policy council are trained on how to interpret the reports regarding corrective action which may be required.
3. Reports from grantee and site/school's internal monitoring reviews, as well as results from federal reviews will be shared so that corrective actions are implemented as soon as possible and no later than 30 days after the review has been conducted.
4. Ongoing follow-up monitoring activities will be conducted by grantee staff, including the Quality Assurance unit and service area managers, to ensure that identified concerns have been addressed and corrected.

	Monroe County School District Head Start Program Standard Operating Procedures/Plans
Program Performance Standards and Other Regulations	Subject: Program Operations Subpart J –Program Management and Quality Improvement
Effective Date: August 16, 2017	Revision Date:

REFERENCE:

Head Start Program Performance Standards- Program Management and Quality Improvement 45 CFR Part(s): 1302.102 (b)(1)(iv)


POLICY:

It is the policy of the Monroe County School District Head Start Program establish protocols, which will prevent recurrence of previous quality and compliance issues, including previously identified deficiencies, safety incidents, and audit findings.

PROCEDURES:

1. MCSDHS's Managers will notify the site/school within a week and create a Corrective Action Plan.
 - a) The email will include a due date for the CAP.
 - b) The email will include the steps for completing a CAP.
2. The CAP is due ten (10) business days after the email is sent to the site/school/
3. All CAPs and follow-ups are documented as part of Manger's monthly repot, for Leadership/Management meetings.
4. The CAP must include the following action steps:
 - a. Describe how each non-compliance finding was corrected.
 - b. If the issue has not been corrected, an explanation including supporting documentation and the anticipated date of completion.
 - c. Describe the procedures implemented to prevent recurrence of the same issues.

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

	Monroe County School District Head Start Program Standard Operating Procedures/Plans
Program Performance Standards and Other Regulations	Subject: Program Operations Subpart J –Program Management and Quality Improvement
Effective Date: August 16, 2017	Revision Date:

REFERENCE:


Head Start Program Performance Standards- Program Management and Quality Improvement 45 CFR Part(s): 1302.102 (b)(2)

POLICY (Planning Process):


It is the policy of Monroe County School District Head Start Program to implement and utilize an inclusive planning process to develop goals, objectives, and expected outcomes. The program will effectively oversee progress towards program goals on an ongoing basis. There will be a continual process of monitoring to evaluate progress and make course corrections as needed.

PROCEDURES:

1. MCSDHS will establish a system wherein sites will be included in the review of relevant program data such as child and family outcomes, services provided, teacher/child interactions, compliance with the Head Start Performance Standards, and progress towards goals.
2. A self-assessment will be conducted on an ongoing and annual basis using program data, including aggregated child assessment data, and professional development and parent and family engagement data as appropriate, to evaluate the program's progress towards meeting goals established under paragraph (a) of this section, compliance with program performance standards throughout the program year, and the effectiveness of the professional development and family engagement systems in promoting school readiness.
3. The program will communicate and collaborate with the governing body and policy council, program staff, and parents of enrolled children when conducting the annual self-assessment.
4. The following roles will be established by Leadership/Management Team:
 - a. When the Self-Assessment will take place.
 - b. Who will be on the team.
 - c. What instrument(s) will be used.
 - d. What will the procedure be for collecting data. Who will compile the data.
 - e. Who will analyze the data and what analyses will be conducted.
 - f. What will the format be for the Self-Assessment report and who will develop it.
 - g. How the information will be presented to the Board and Policy Council/Policy Committee for their approval.
 - h. What strategies will be used by the management team, the Policy Council/Committee, and the Board to ensure that the improvement plan serves as a touchstone for ongoing program assessment and continuous program improvement.

	Monroe County School District Head Start Program Standard Operating Procedures/Plans
Program Performance Standards and Other Regulations	Subject: Program Operations Subpart J –Program Management and Quality Improvement
Effective Date: August 16, 2017	Revision Date:

5. After receiving input from stakeholders through sharing information with parents, governing body, policy council, and administration a strategic plan will be created by the Leadership team and then given back to policy council and governing body for more input. The information gathered may consist of Community Assessment, Self-Assessment, progress monitoring, Program Information Report (PIR), and ongoing monitoring. The results of the Community Assessment, the Self-Assessment, Program Information Report (PIR), and Ongoing Monitoring will be utilized for strategic planning in collaboration parents, community partners, the governing body, policy council and site/school executive directors.
6. All key findings from the strategic planning session will assist the program in identifying the critical program goals which, which will be developed into program action plans. These action plans will be implemented at the start of a new school year/fiscal year.
7. The sites will submit reports, including findings from the self-assessment, to the grantee. MCSDHS will submit a comprehensive report which will include the findings of the self-assessment, including information listed in paragraph (b)(2)(i) of this section to the responsible HHS Region IV official in a timely manner as required.

	Monroe County School District Head Start Program Standard Operating Procedures/Plans
Program Performance Standards and Other Regulations	Subject: Program Operations Subpart J –Program Management and Quality Improvement
Effective Date: August 16, 2017	Revision Date:

REFERENCE:

Head Start Program Performance Standards –Implementation of Program Performance Standards 45 CFR 1302.103 (a)(b)


POLICY:

It is the policy of the Monroe County School District Head Start Program to implement the new Head Start Performance Standards effective November 7, 2016.

PROCEDURES:

1. The program implementation plan will outline effective and timely implementation of the Performance Standards and specifically address the purchase of materials and allocation of staff time, as appropriate.
2. The plan will comply with all requirements as described in 1302.103(b). The program's approach will ensure adequate preparation for effective and timely service delivery to children and their families including, at a minimum, review of community assessment data.
 - a. The grantee, in collaboration with the agency leadership, governing body and policy council, will determine and develop an appropriate strategy for implementing required program changes, including assessing any changes in the number of children who can be served, as necessary
 - b. Assessments will be conducted regarding the purchase of and training on curriculum, assessment, or other materials, as needed. Assessment of program professional development needs, staffing patterns, and development of coordinated management system approach described in 1302.101(b).
 - c. The plan will ensure the development of appropriate protections of data when sharing data as required.
 - d. Children enrolled in the program on or after November 7, 2016 will not be displaced during the program year. Children leaving or Head Start at the end of the program year following the publication of the final rule as a result of any slot reductions will receive services described in 1302.70 and 1302.72 to facilitate transitions to other programs.

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

	Monroe County School District Head Start Program Standard Operating Procedures/Plans
Program Performance Standards and Other Regulations	Subject: Program Operations Subpart J –Program Management and Quality Improvement
Effective Date: August 16, 2017	Revision Date:

REFERENCE:


Internal Policy

POLICY:

It is the policy of the Monroe County School District Head Start Program that social media presents certain risks and carries with it certain responsibilities. To assist staff in making responsible decisions about use of social media, procedures have been established for appropriate use of social media, which applies to all employees.

Procedures


1. Social media includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else's web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or chat room, whether or not associated or affiliated with MCSDHS, as well as any other form of electronic communication. Each staff person is solely responsible for what he or she post online. Keep in mind that any conduct that adversely affects your job performance, the performance of fellow employees or otherwise adversely affects employees, children, families, anyone served by MCSDHS, people who work on behalf of MCSDHS or MCSDHS legitimate business interests may result in disciplinary action, up to and including termination.
2. Employees must use extreme caution when contacting in any manner, a family/parent of a child, childcare providers, or others who they serve through their work at MCSDHS. An employee must review a new friend or continuing friend situation with her/his supervisor. Employees are strictly prohibited from including any confidential/private information in any specific or general way and/or photographs related to, MCSDHS its employees, children, families, or other people served by MCSDHS, its delegates and/or child care partners on any form of social media.
3. Maintain the confidentiality of MCSDHS business or confidential information. Do not post internal reports, policies, procedures, or other internal business-related confidential communications.
4. Do not create a link from your blog, website, or other social networking site to the Agency website without identifying yourself as an MCSDHS employee.
5. Express only personal opinions. Never represent yourself as a spokesperson for MCSDHS . If the department is a subject of the content you are creating, be clear and open about the fact that you are a MCSDHS employee and make it clear that your views do not represent those of MCSDHS, fellow employees, families, children, or others served by the Agency, suppliers or people working on behalf of MCSDHS. If you do publish a blog or post online related to the work you do or subjects associated with the department, make it clear that you are not speaking on behalf of the Agency. It is best to include a disclaimer such as "The postings on this site are my own and do not necessarily

	Monroe County School District Head Start Program Standard Operating Procedures/Plans
Program Performance Standards and Other Regulations	Subject: Program Operations Subpart J –Program Management and Quality Improvement
Effective Date: August 16, 2017	Revision Date:

reflect the views of MCSDHS.

6. Refrain from using social media while on work time or on equipment provided by MCSDHS, unless it is work-related as authorized by your supervisor.

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	Monroe County School District Head Start Program Standard Operating Procedures/Plans
Program Performance Standards and Other Regulations	Subject: Program Operations Subpart J –Program Management and Quality Improvement
Effective Date: August 16, 2017	Revision Date:

REFERENCE:

MCSD Technology Policy and Head Start Internal Policy

POLICY:

It is the policy of the Monroe County School District Head Start Program that computers and computer accounts used by employees are provided to assist them in the performance of their jobs. The computer and network systems belong to the Monroe County School District and/or MCSD Head Start, and should be used primarily for Head Start business purposes.


The following procedures apply to all users of the computer and network resources and services, wherever the users are located. Violations of this policy may result in the loss of computer and network access and/or disciplinary action, up to and including termination, and/or legal action.

School Board Policy:

1. [7540.01 - TECHNOLOGY PRIVACY](#)
2. [7530 - PERSONAL USE OF DISTRICT EQUIPMENT/FACILITIES](#)
3. [7540.01B - AT-HOME ACCESS TO DISTRICT TECHNOLOGY](#)
4. [7530A - TECHNOLOGY EQUIPMENT SECURITY PROCEDURES](#)
5. [7540.01A - PERSONAL USE OF DISTRICT TECHNOLOGY](#)
6. [7542 - NETWORK ACCESS TO TECHNOLOGY RESOURCES FROM PERSONALLY-OWNED PERSONAL COMMUNICATION DEVICES](#)
7. [8315 - INFORMATION MANAGEMENT](#)
18. [7540 - COMPUTER TECHNOLOGY AND NETWORKS](#)

PROCEDURES


Computer users are governed by the following provisions, which apply to all use of computer and network resources and services. Computer and network resources and services include, but are not limited to, the following: servers, workstations, computers, laptops, cellphones, software, and internal or external communications networks that are accessed directly or indirectly from computer facilities. The term “users”, as used in this policy, refers to all employees, volunteers, parents, family members, independent contractors, and other persons or entities accessing or using computer

	Monroe County School District Head Start Program Standard Operating Procedures/Plans
Program Performance Standards and Other Regulations	Subject: Program Operations Subpart J –Program Management and Quality Improvement
Effective Date: August 16, 2017	Revision Date:

and network resources and services. All computer users have the responsibility to use computer resources in an efficient, effective, ethical, and lawful manner, and in a manner, that is consistent with the grantee’s policies and procedures, and with the Head Start Performance Standards.

1. Appropriate Use

- Fraudulent, harassing, embarrassing, indecent, profane, obscene, intimidating, violent, or unlawful material may not be deliberately sent, received, displayed, or stored on any computer or network owned by the grantee. Any access to sexually explicit and prurient material or to gambling related material is specifically prohibited. Users encountering or receiving such material should immediately report the incident to their supervisor.
- The computer and network resources and services of the grantee may not be used for the display, transmission, or storage of commercial advertisements, solicitations, promotions, destructive programs, or any other unauthorized purpose. Use of the electronic mail systems to distribute advertisements, jokes, chain letters, or any other personal notices or messages to distribution lists or other groups of more than three people either inside or outside of the grantee is prohibited.
- Users must comply with all relevant federal and state laws regarding political activities of Head Start grantees and other publicly funded organizations. The grantee’s computer and network systems may not be used “...in any manner supporting or resulting in the identification of [The grantee] with any partisan or nonpartisan political activity or any other political activity associated with a candidate or contending faction or group in an election for public or party office” (Head Start Act, Section 656) or “...for the preparation, distribution, or use of any kit, pamphlet, booklet, publication, radio, television, or video presentation designed to support or defeat legislation pending before Congress or any State legislature” (Section 503 of Public Law 107-116, and other appropriations acts). In addition, no federal funds, program services paid for by federal funds, Head Start agency-owned equipment, facilities, supplies, or employees on program time may be used for voter participation or lobbying activities.
- Users must exercise reasonable care to prevent loss or damage to computer hardware, software, and information in their possession. This includes, but is not limited to physical damage or loss of hardware or software and the use of reasonable care to prevent the spread of computer viruses, worms, ‘Trojan horses’, and other malicious code. Users may not connect, disconnect, alter, repair, move, or otherwise modify any network or grantee computer, monitor, printer, router, switch, or other hardware without prior express authorization to do so.
- Users may not use or install software of any kind onto any of MCSDHS computer or network without receiving prior express authorization to do so. Users must comply with all software licenses, copyrights, and all other state and federal laws governing intellectual property.
- Users should seek to ensure that adequate network bandwidth is available for activities related

	Monroe County School District Head Start Program Standard Operating Procedures/Plans
Program Performance Standards and Other Regulations	Subject: Program Operations Subpart J –Program Management and Quality Improvement
Effective Date: August 16, 2017	Revision Date:

to the mission of the agency. Users may not access digital audio and video, including streaming media, without the prior express authorization. The use of peer-to-peer file sharing networks is specifically prohibited.

- Users must restrict personal use of the grantee’s computer systems and network resources to scheduled breaks and other non-work hours, except with the permission of their supervisor. This includes, but is not limited to, the use of computer games, chat rooms, Instant Message (IM) systems, and the non-work-related use of Internet e-mail, the World Wide Web, and newsgroups. The use of personal, web-based e-mail (e.g., Hotmail, Yahoo! Mail), while not prohibited, is discouraged. Users must not attempt to access network or Internet systems unless specifically authorized to do so by the operators of those systems. Users must not alter or copy a file belonging to another user without first obtaining permission from the owner of the file.


Security

- The grantee has the right to take any action that it believes is necessary to ensure the integrity of its computer and network resources. It may, at the sole discretion of the Executive Director or designee, edit or delete any program, document, or other information stored on any computer or network, including data stored on any personal computer owned by MCS DHS. It also has the sole right to determine the appropriate content for the web site and portal, and to edit or delete any material posted there.
- Users are responsible for safeguarding their passwords for the system. Individual passwords should not be printed, stored on-line, or given to others. Users are responsible for all transactions made using their passwords. Under no circumstances may users allow anyone but themselves to log on to any computer or network owned by MCS DHS using their password. Users must not leave their computers unattended without logging off from the computer or network.

Privacy

- The grantee has the right, but not the duty, to monitor all aspects of the computer system, including employee e-mail, to ensure compliance with this policy. Employees should not have the expectation of privacy in anything they create, store, send, or receive on any the grantee’s computer.
- Users grant permission to the grantee to include their name, Internet address, business address, and business telephone number in publicly accessible directories, databases, and documents, including a staff directory on the World Wide Web. All other personal information will be considered confidential, and will not be published or released in any form without written permission.

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

	Monroe County School District Head Start Program Standard Operating Procedures/Plans
Program Performance Standards and Other Regulations	Subject: Program Operations Subpart J –Program Management and Quality Improvement
Effective Date: August 16, 2017	Revision Date:

REFERENCE:

Public Law 107–204 “An Act To protect investors by improving the accuracy and reliability of corporate disclosures made pursuant to the securities laws, and for other purposes.” Also known as Sarbanes-Oxley Act.

POLICY:

It is the policy of the Monroe County School District Head Start Program that in accordance with the Sarbanes-Oxley Act, which makes it a crime to alter, cover up, falsify, or destroy any document with the intent of impeding or obstructing any official proceeding, this policy provides for the systematic review, retention and destruction of documents received or created by the grantee in connection with the transaction of organization business. This policy covers all records, documents, regardless of physical form.

Procedure

1. The Head Start Director or designee will be responsible for the ongoing process of identifying its records, which have met the required retention period and overseeing their destruction.
2. Hard copy of documents will be destroyed by shredding after they have been retained until the end of the document retention period.
3. Online copies will be destroyed by proven means to destroy such media after they have been retained until the end of the document retention period.
4. Document destruction will be suspended immediately, upon any indication of any official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation.
5. Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against the grantee and its employees and possible disciplinary action against responsible individuals.
6. The Executive Director will periodically review these procedures with legal counsel or the Board of Director approved auditors to ensure that the policy is in compliance with new or revised regulations.

These procedures will be evaluated as part of the Self-Assessment.