



Ongoing Monitoring to Ensure All Children Are Safe

Native American Family and Child Conference

March 20, 2024

Part 1: 1:00 p.m. – 2:30 p.m.

Part 2: 3:00 p.m. – 4:30 p.m.



Head Start Regional TTA Network

Session Objectives



- Participants will examine how a management systems thinking approach can support and strengthen the implementation of consistent and effective safety practices.
- Identify one or more resources used to support the prevention of child incidents.

Head Start staff value every child, and it is everyone's job to keep children safe



Head Start leaders support children's safety and well-being by creating safe program environments.



Positive guidance supports social emotional development and promotes engagement in the learning environment.



Head Start leaders cultivate an organizational culture that sets an expectation for child safeguarding and that builds trust, transparency, accountability, empathy, and equity for staff and families.

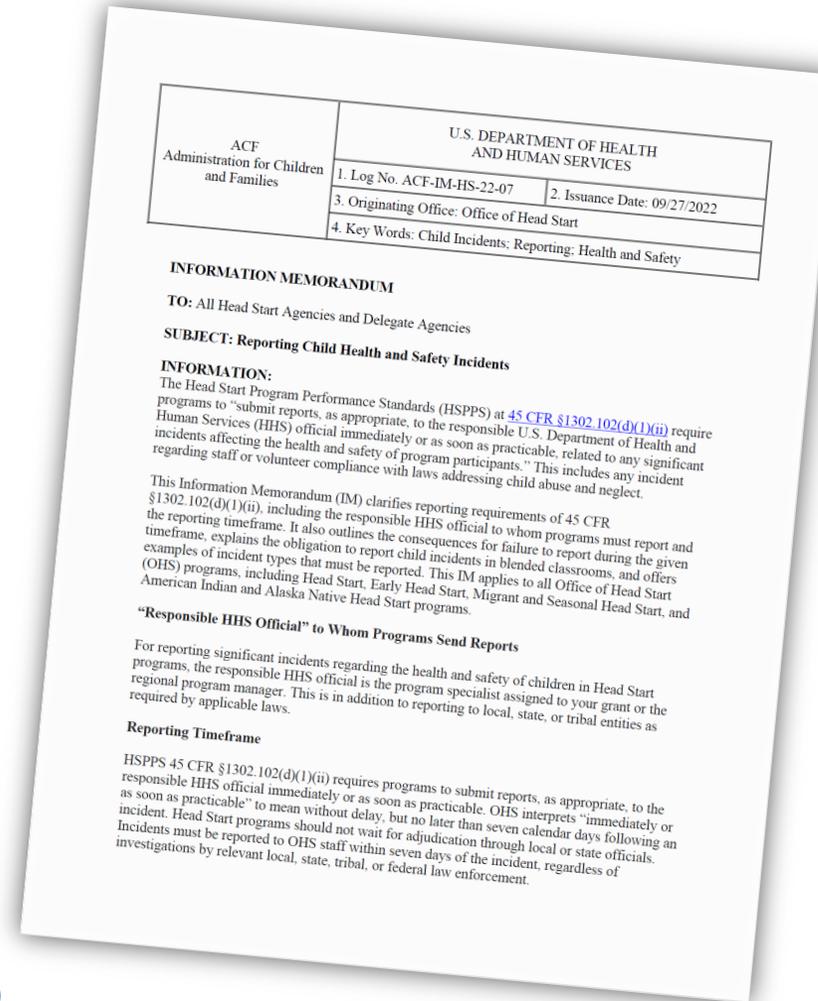


Everyone who works in Head Start programs adheres to the Head Start standards of conduct.



Reporting Child Health and Safety Incidents

45 CFR 1302.102(d)(1)(ii)



[Reporting Child Health and Safety Incidents | ECLKC \(hhs.gov\)](https://www.eclkc.gov)



Head Start Regional TTA Network

Risk Assessment Notification (RAN)

Risk Assessment Notification (RAN) Review
Fiscal Year (FY) 2024 Monitoring Protocol

Risk Assessment Notification (RAN) Review Monitoring Protocol

Purpose
The Head Start Risk Assessment Notification (RAN) review will be conducted as needed, when the Office of Head Start (OHS) requires more information about a significant incident affecting the health and safety of program participants. The RAN review will:

- Document serious health and safety incidents and ensure that recipients are following requirements for timely, accurate reporting.
- Identify if there are contributing program or management factors that may have enabled the incident.
- Communicate any required corrective action steps to the recipient.
- Provide feedback and inform support to strengthen program management approaches and prevent similar incidents from occurring in the future.

OHS will use information from RAN reviews to understand regional and national data trends, target support to recipients, and ensure healthy and safe learning environments for children, families, and program staff.

Approach
Exhibit 1: RAN Review Process



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graph LR; A[Incident Reporting] --> B[OHS Analysis]; B --> C[RAN Review]; C --> D[Review Report]
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Incident Reporting: Head Start recipients are required to immediately report significant incidents affecting the health and safety of program participants. Reports must be submitted immediately through HSES Correspondence, and no later than seven days following an incident. To support recipients in meeting this requirement, OHS is providing a link to a sample template within this protocol that can be used to meet the reporting requirement (see page 9).

Incident reports must be sent to the Program Specialist or Regional Program Manager at the Regional Office through HSES Correspondence. Recipients may refer to [ACF-IM-HS-22-07 Reporting Child Health and Safety Incidents](#) for more information. If you have any questions about the reporting requirement, contact your Program Specialist.

OHS Analysis: Upon receiving a report of a significant health and safety incident, OHS will review the information and reach out to the program to request any additional information, as needed. Based on the information provided about the incident, OHS will determine if a RAN review is required.

RAN Review: If a RAN review is initiated, the Regional Office will contact the recipient to schedule the review, which is conducted by the Program Specialist. The review comprises a virtual data tour conducted with the recipient, which will explore the program's management systems that support children's health

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FY24 Sample Incident Reporting Form

How to Use This Resource

When health and safety incidents occur, Head Start recipients are required to report to the Office of Head Start (OHS) Regional Office immediately or as soon as practicable, and not later than seven calendar days following the incident. Head Start recipients should not wait for the completion of state or other investigations but should report immediately or as soon as practicable.

Recipients are responsible for reporting the following incidents, precipitated by staff, consultants, contractors, or volunteers, of:

- Potential child abuse, neglect, and inappropriate conduct by program staff, consultants, contractors or volunteers.
- Inadequate supervision.
- Unauthorized release.
- Child injuries resulting from intentional or unintentional acts (such as playground injuries) that require either hospitalization or emergency room medical treatment, such as a broken bone; a severe sprain; chipped or cracked teeth; head trauma; deep cuts; contusions or lacerations; or animal bites.

This sample form can be used or adapted to fulfill this requirement; however, it is not required. If the recipient has an incident form readily available containing the information requested on this form, then the recipient's existing form may be used.

Submit this form, or the recipient's incident form with similar information, via the Head Start Enterprise System (HSES) Correspondence tab, with attention to your assigned Program Specialist, and copy the Supervisory Program Specialist or Regional Program Manager. Please include all information or documentation pertinent to the incident being reported. Please do not include any personal identifiable information (PII) for children and adults involved in the incident.

If you have any questions or need assistance completing this form, please reach out to your assigned Program Specialist.

1



Health & Child Safety Citations

Inappropriate Supervision

- As defined by the HSPPS at 45 CFR §§1302.90(c)(1)(v), 1302.47(b)(5)(iii), and 1303.72(a)(3)
- Includes children left alone or unsupervised by staff, consultants, contractors, or volunteers while under their care

Violations of the Standard of Conduct

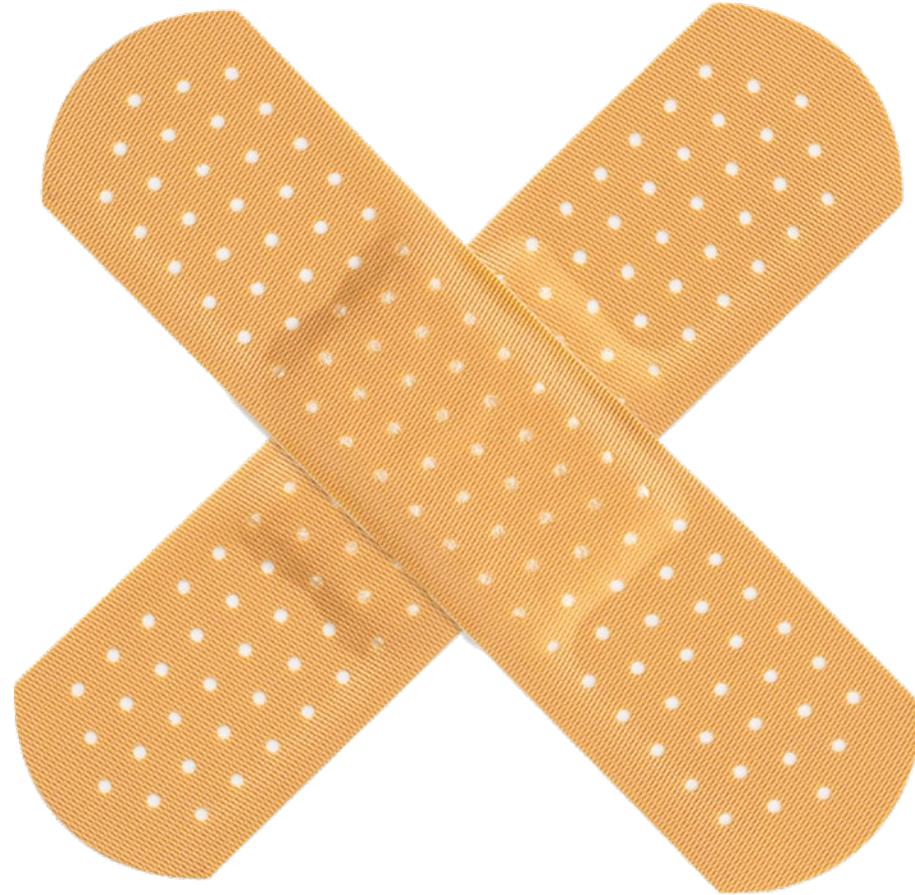
- As defined by the HSPPS at 45 CFR §1302.90(c)(1)(ii)
- Includes inappropriate discipline, the maltreatment or endangerment of the health or safety of children, and child abuse

Inappropriate Release

- As defined by the HSPPS at 45 CFR §1302.47(b)(5)(iv) and (b)(7)(v),
- Includes releasing children to an unauthorized adult



Think Beyond the Band-Aid



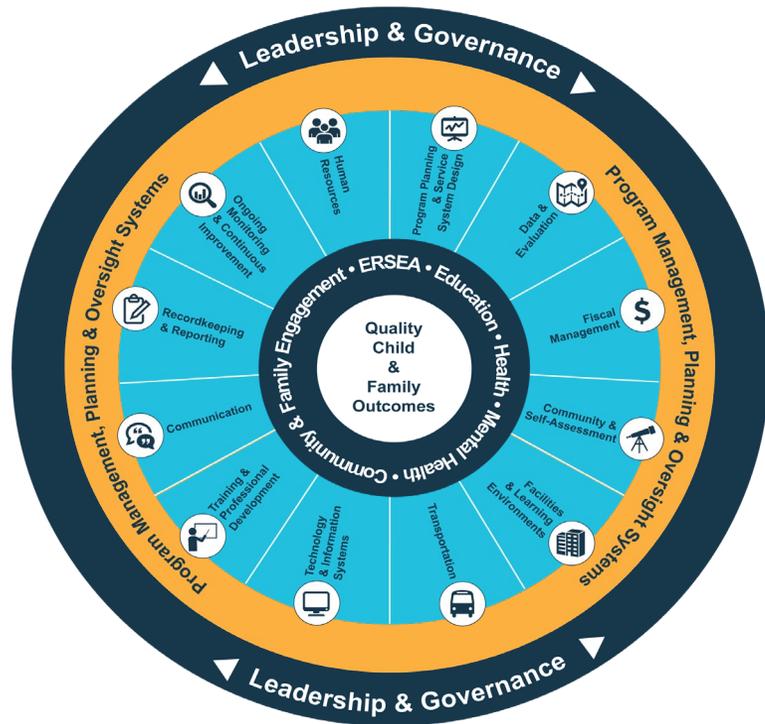


To Err is Human

Human beings, in all lines of work, make errors. Errors can be prevented by designing systems that make it hard for people to do the wrong thing and easy to do the right thing.

Head Start Management Systems

Systems Work Together



Tunneling



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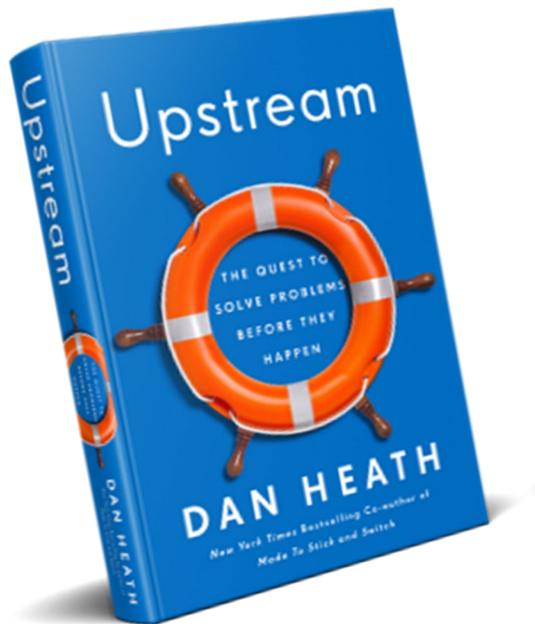
Problem Blindness



Head Start Regional TTA Network

Lack of Ownership





- 1. Tunneling:**
“I can’t deal with that right now.”
- 2. Lack of ownership:**
“That’s not my problem to solve.”
- 3. Problem blindness:**
“I don’t see the problem.”

Root Cause Analysis Tools

1. Root Cause
2. Fishbone Diagram
3. The Five Why's

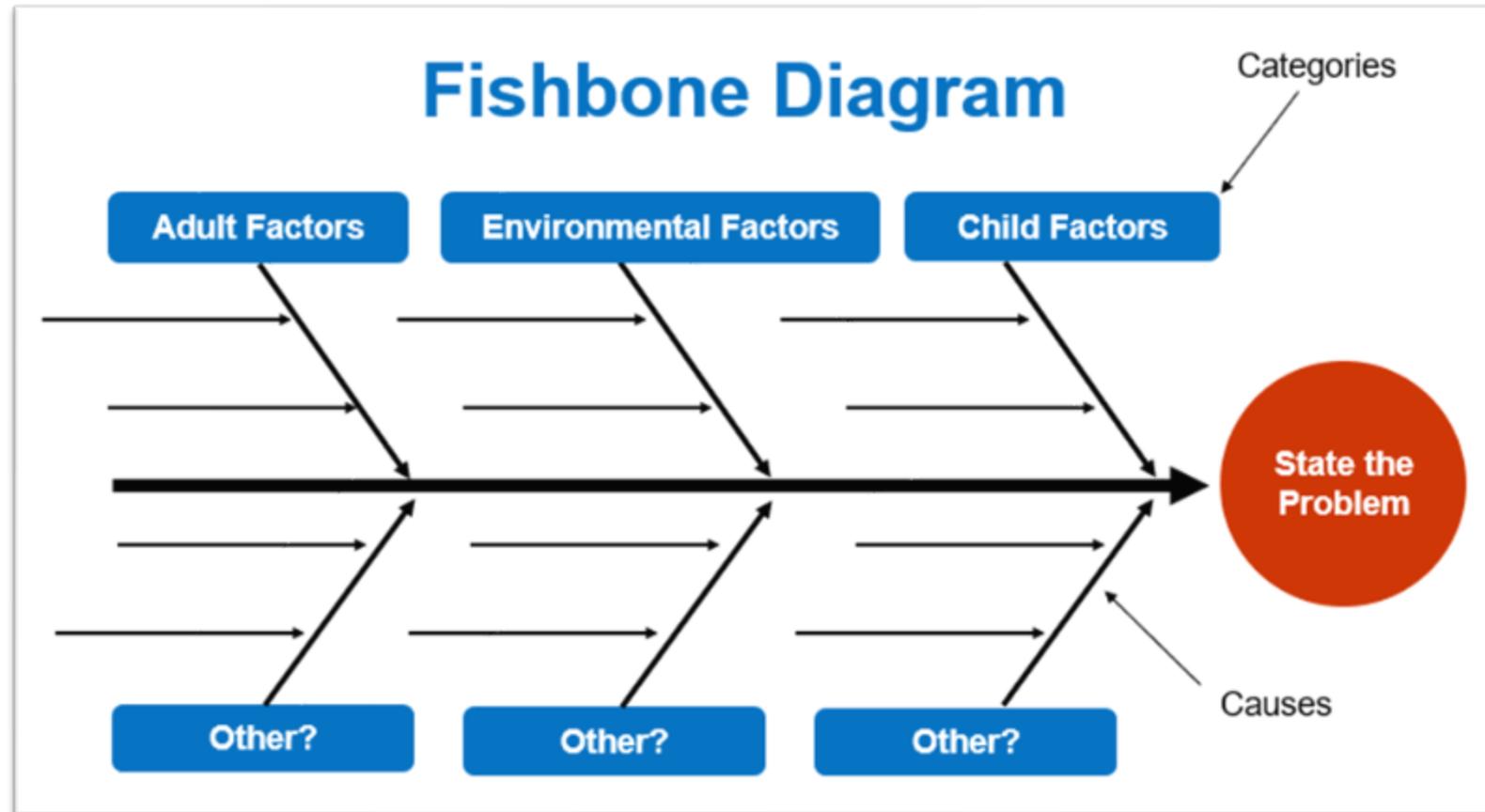


Root Cause

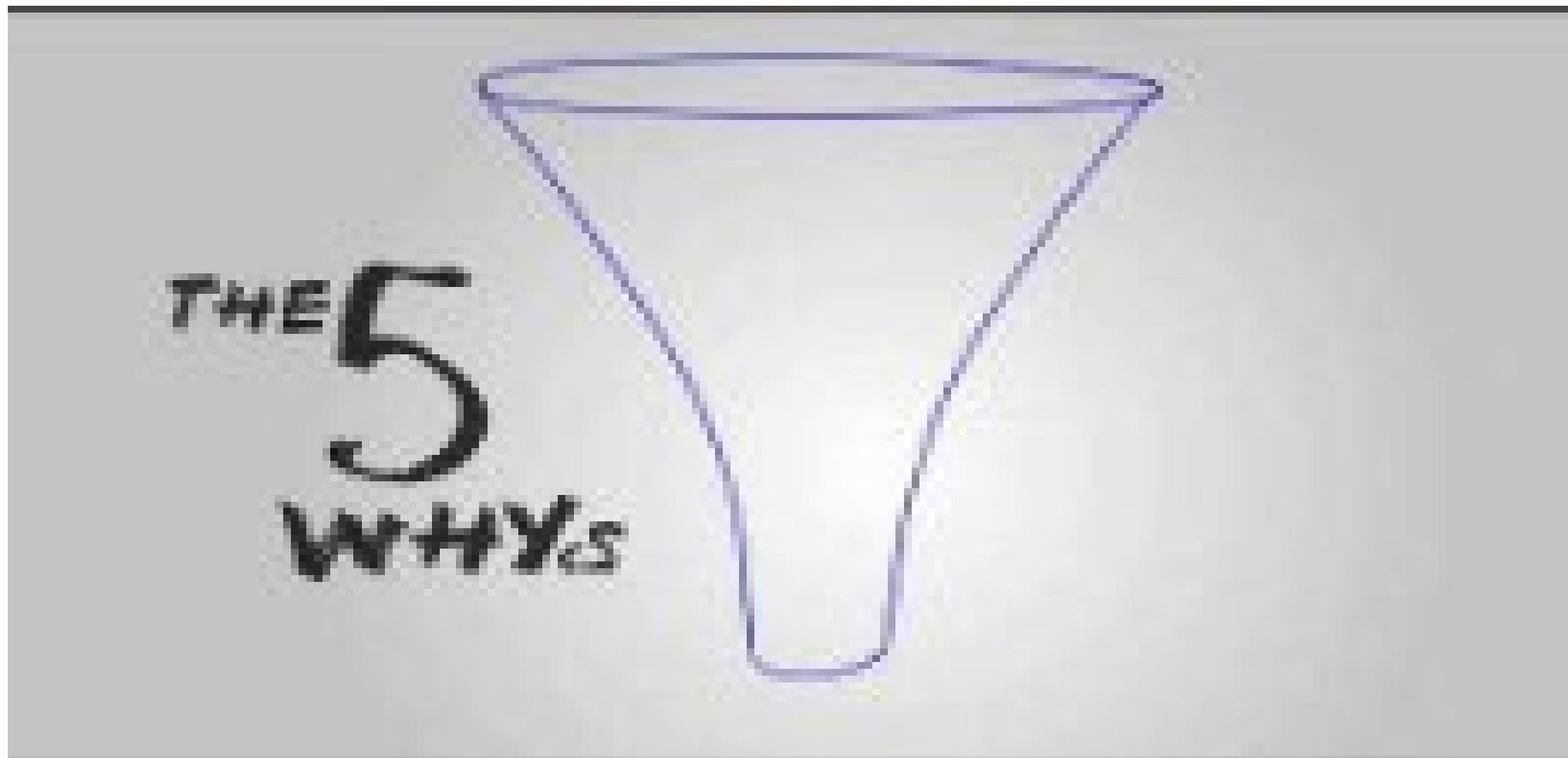


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Fishbone Cause and Effect Diagram



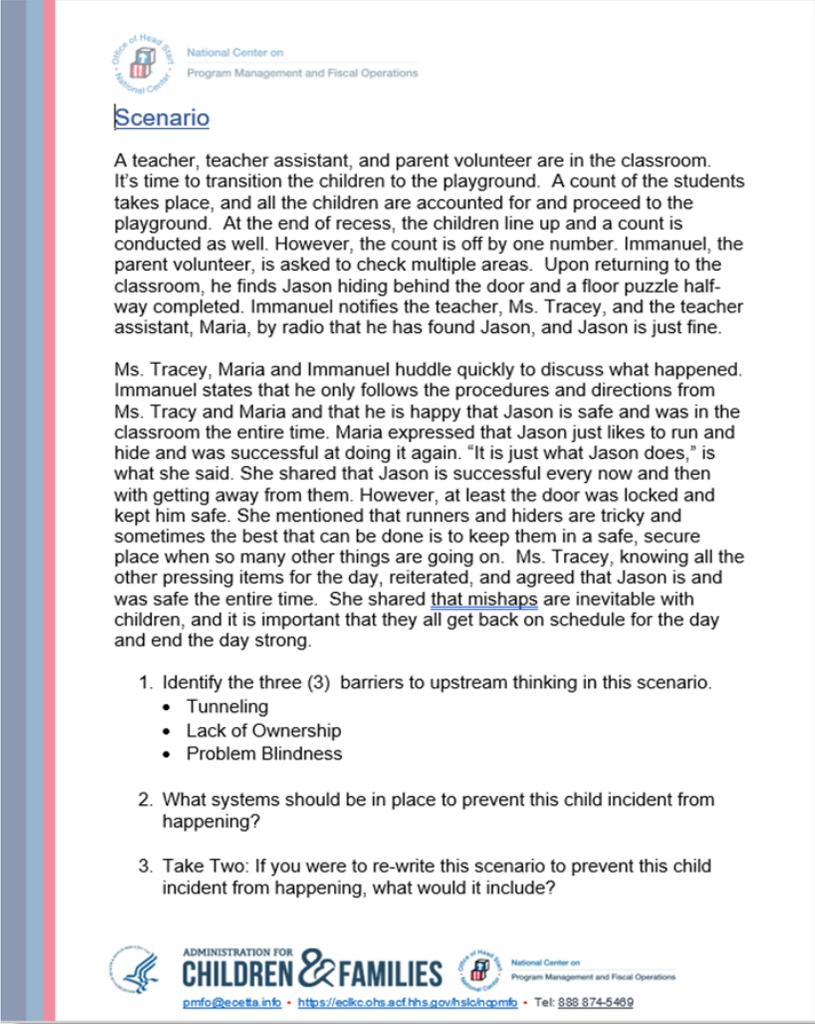
The 5 Whys



Identify the three (3) barriers to upstream thinking in this scenario.

What systems should be in place to prevent this child incident from happening?

If you were to re-write this scenario to prevent this child incident from happening, what would you change?



 National Center on
Program Management and Fiscal Operations

Scenario

A teacher, teacher assistant, and parent volunteer are in the classroom. It's time to transition the children to the playground. A count of the students takes place, and all the children are accounted for and proceed to the playground. At the end of recess, the children line up and a count is conducted as well. However, the count is off by one number. Immanuel, the parent volunteer, is asked to check multiple areas. Upon returning to the classroom, he finds Jason hiding behind the door and a floor puzzle half-way completed. Immanuel notifies the teacher, Ms. Tracey, and the teacher assistant, Maria, by radio that he has found Jason, and Jason is just fine.

Ms. Tracey, Maria and Immanuel huddle quickly to discuss what happened. Immanuel states that he only follows the procedures and directions from Ms. Tracy and Maria and that he is happy that Jason is safe and was in the classroom the entire time. Maria expressed that Jason just likes to run and hide and was successful at doing it again. "It is just what Jason does," is what she said. She shared that Jason is successful every now and then with getting away from them. However, at least the door was locked and kept him safe. She mentioned that runners and hiders are tricky and sometimes the best that can be done is to keep them in a safe, secure place when so many other things are going on. Ms. Tracey, knowing all the other pressing items for the day, reiterated, and agreed that Jason is and was safe the entire time. She shared that mishaps are inevitable with children, and it is important that they all get back on schedule for the day and end the day strong.

1. Identify the three (3) barriers to upstream thinking in this scenario.
 - Tunneling
 - Lack of Ownership
 - Problem Blindness
2. What systems should be in place to prevent this child incident from happening?
3. Take Two: If you were to re-write this scenario to prevent this child incident from happening, what would it include?

 ADMINISTRATION FOR
CHILDREN & FAMILIES  National Center on
Program Management and Fiscal Operations
pmfo@eocetta.info • <https://eclkc.ohs.acf.hhs.gov/hslc/npmfo> • Tel: 888.874.5469

Prevent Fires, Don't Just Put Them Out



- Put systems in place to help identify and prevent problems instead of reacting in crisis mode when an issue occurs
- Look for trends across root cause analyses to identify how problems may be connected at a systems level

“So often in life, we get stuck in a cycle of response. We put out fires. We deal with emergencies. We handle one problem after another, but we never get around to fixing the systems that caused the problems.”

—Upstream, p.5

End of Part 1

Session 2 will begin at 3:00 p.m.





Ongoing Monitoring to Ensure All Children Are Safe

Part 2



Head Start Regional TTA Network

Leadership and Governance

- Governing Body/Tribal Council
- Policy Council
- Management Staff

Part 1301 – Program Governance



Leaders in a Culture of Safety

- Set the expectation that all staff will work to achieve consistently safe operations.
- Create an environment where all staff are comfortable expressing their concerns.
- Ensure everyone knows their concerns will be received openly and treated with respect.
- Demonstrate that the organization learns from problems and makes improvements.
- Avoid punishing or blaming individuals for system-based errors.



Program Management, Planning, and Oversight Systems

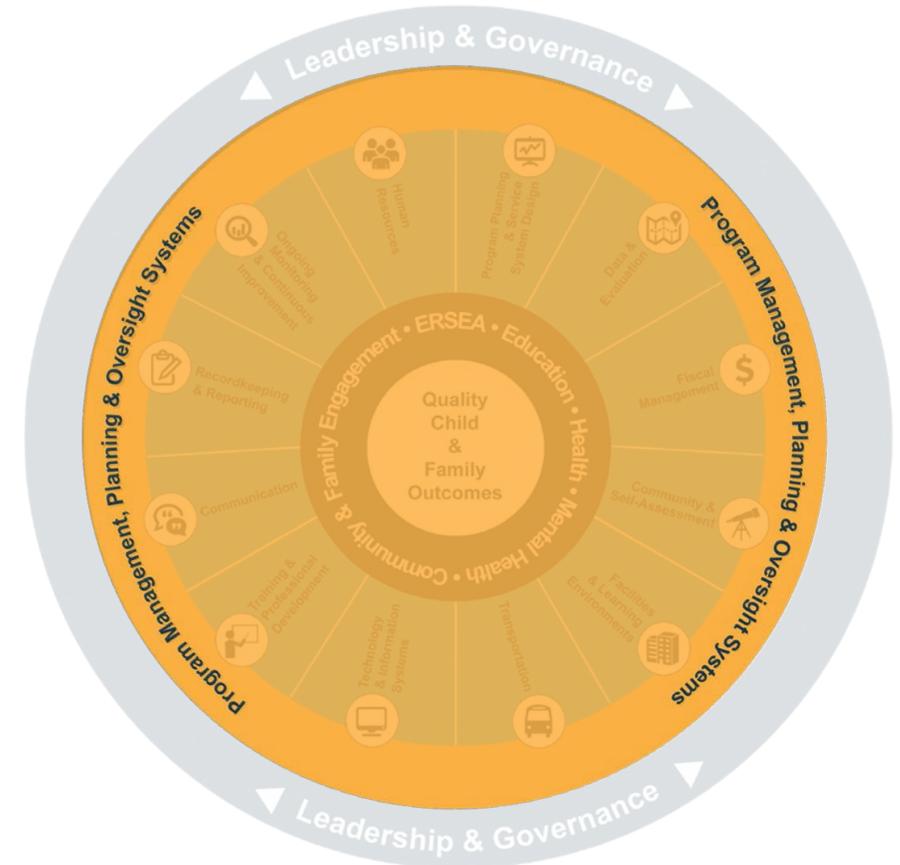
1302 Subpart J – 1302.101 (a)(1-4)
– Management System

1302 Subpart J – 1302.103 (a and b)

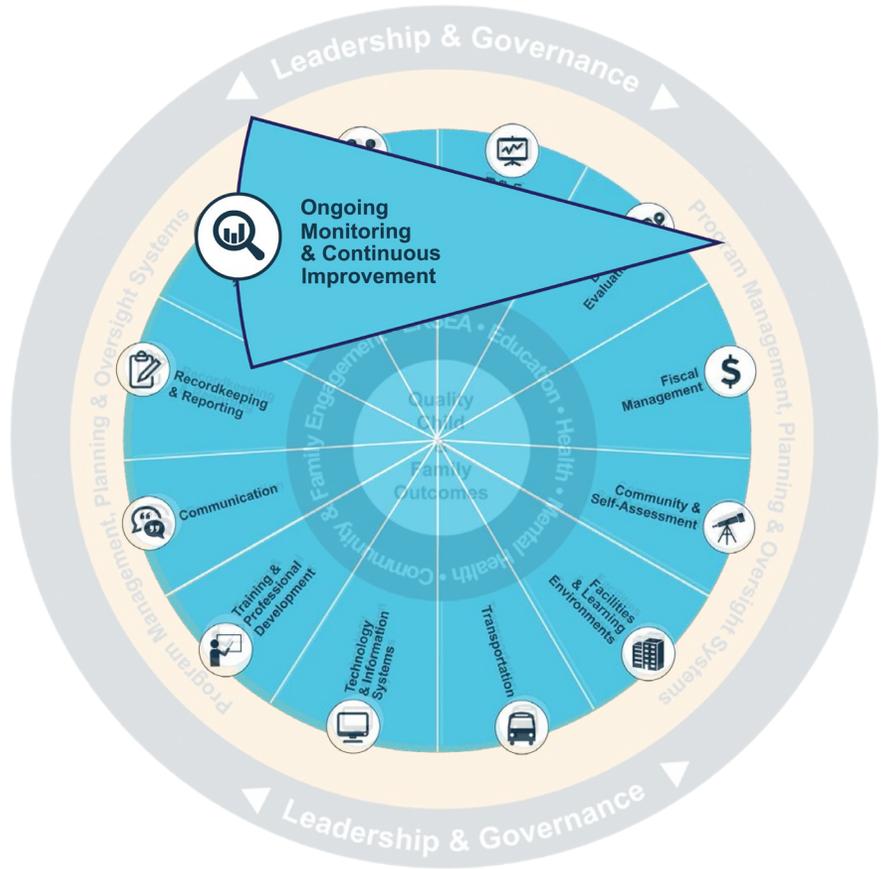
– Implementation of HSPPS

1304 – Federal Administrative Procedures

1305 – Definitions



Ongoing Monitoring & Continuous Improvement



- Adjusts programs to better address goals and objectives
- Shares data with staff, Policy Councils, and governing bodies to engage all in the program planning process

1302 Subpart J - 1302.102(b)(1)(i-iv)

1302 Subpart J – 1302.102(b)(2)

Steps to Establish a Culture of Safety



1. Establish policies and procedures
2. Train all staff, consultants, contractors, and volunteers
3. Implement effective health and safety practices
4. Enforce effective implementation through ongoing monitoring

Ensure Policies Include Written Procedures



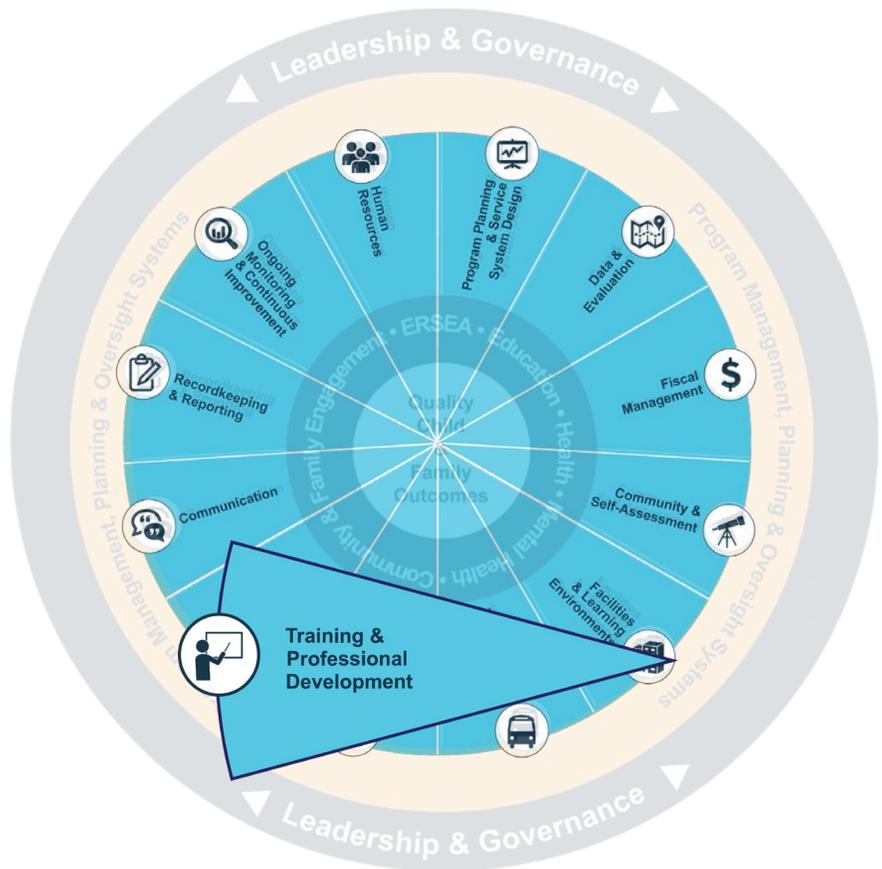
- Procedures describe how to implement a policy.
- For example, a policy may say that staff must report suspected abuse and neglect; the procedures explain what staff needs to do.
- Procedures ensure all staff implements policies the same way.

Enforce Implementation Through Ongoing Monitoring



- Who monitors your health and safety practices?
- How do you monitor?
- When do you monitor?
- How do you share the results?
- What does your program do with this information?

Training & Professional Development



- Emphasizes the importance of training and technical assistance for every grantee
- Offers a range of instructional resources including federal and regional T/TA staff and key resources on the ECLKC website

1302 Subpart I - 1302.92(b)



Head Start Regional TTA Network

Training is the Bridge to Implementation



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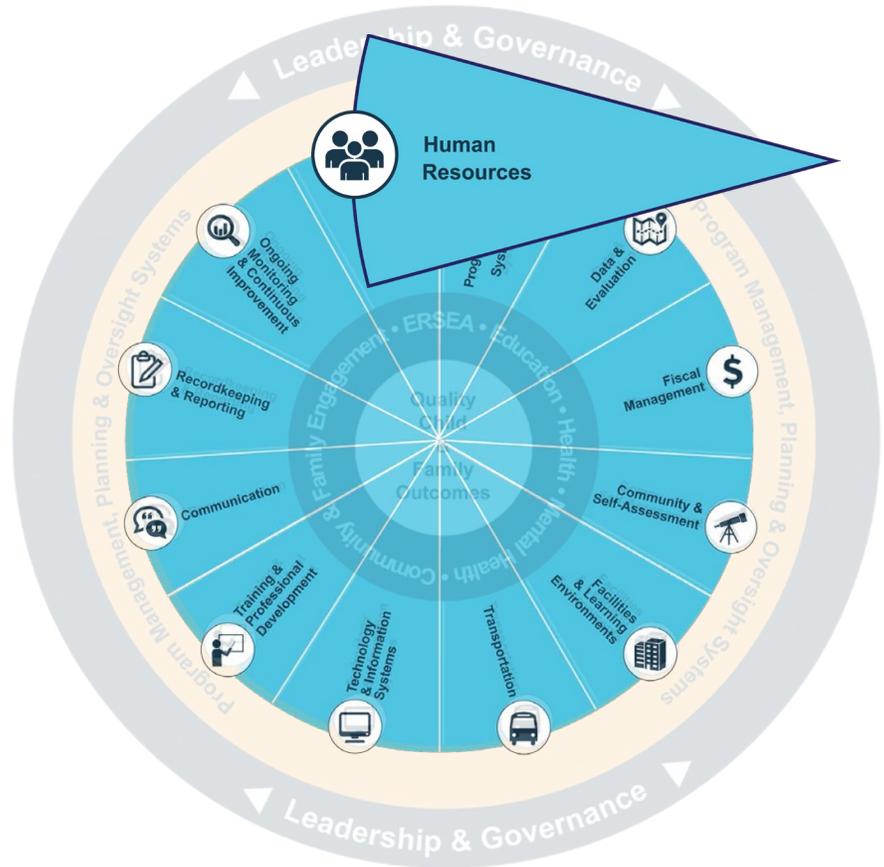
How do you verify that staff understand the key messages in policies and procedures and what they need to do?

Provide Intentional Support for Implementation



- Ensure staff have the knowledge, resources, and time to complete procedures correctly
- Ask staff for feedback about what is/is not working
- Address questions and concerns honestly and assign someone with authority to follow up

Human Resources



- Reminds us that a Head Start program is only as good as its people
- Ensures that staff and volunteers have the credentials and competencies needed to fulfill responsibilities

1302 Subpart I

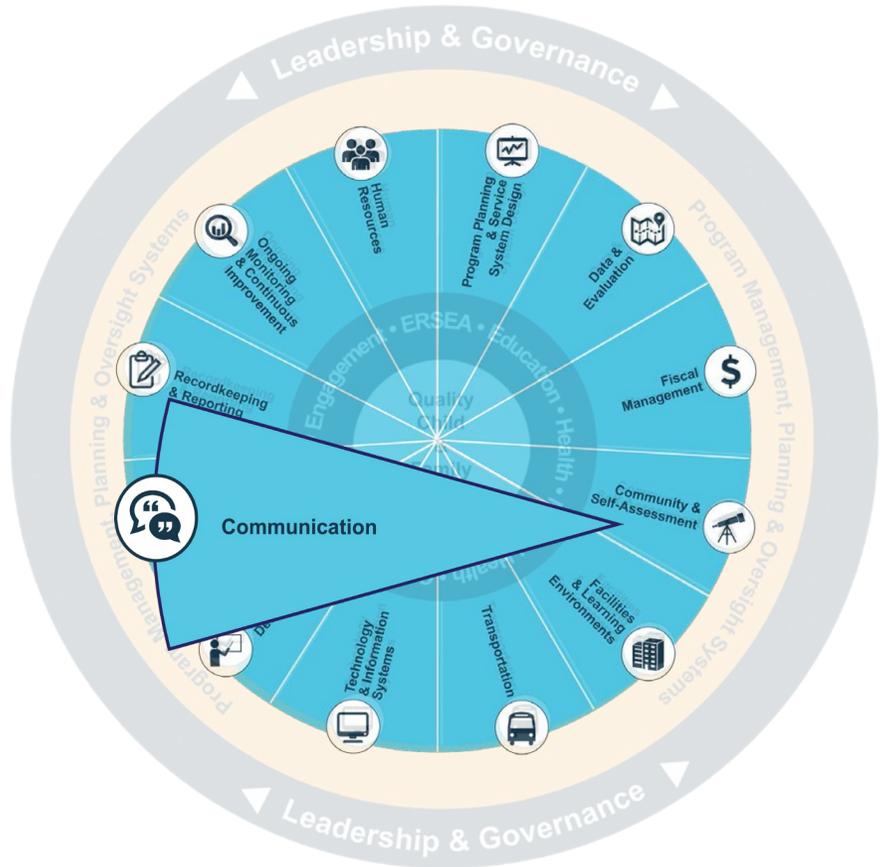
Maintain Staff Wellness Programs

When adults are stressed, they often go to default coping behaviors that are inconsistent with responsive caregiving.

Healthy adults are better able to support the health and safety of the children in their care.



Communication



- Builds relationships with internal and external stakeholders
- Helps programs “tell their stories” as they pursue program and school readiness goals

1301 - Program Governance

1302 - Program Operations

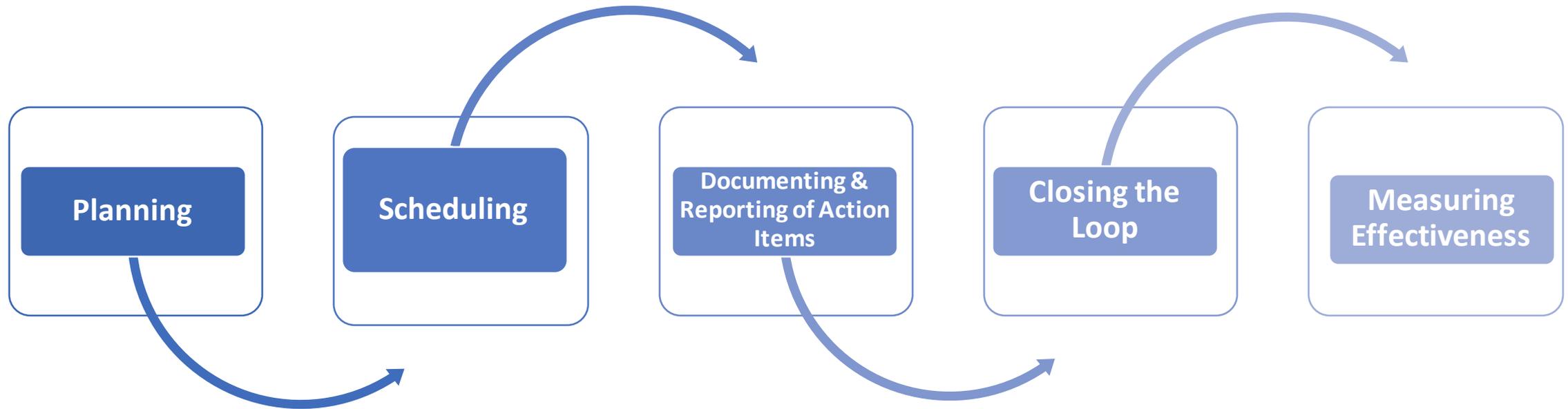
1303 - Financial and Administrative Requirements

1304 - Federal Administrative Procedures

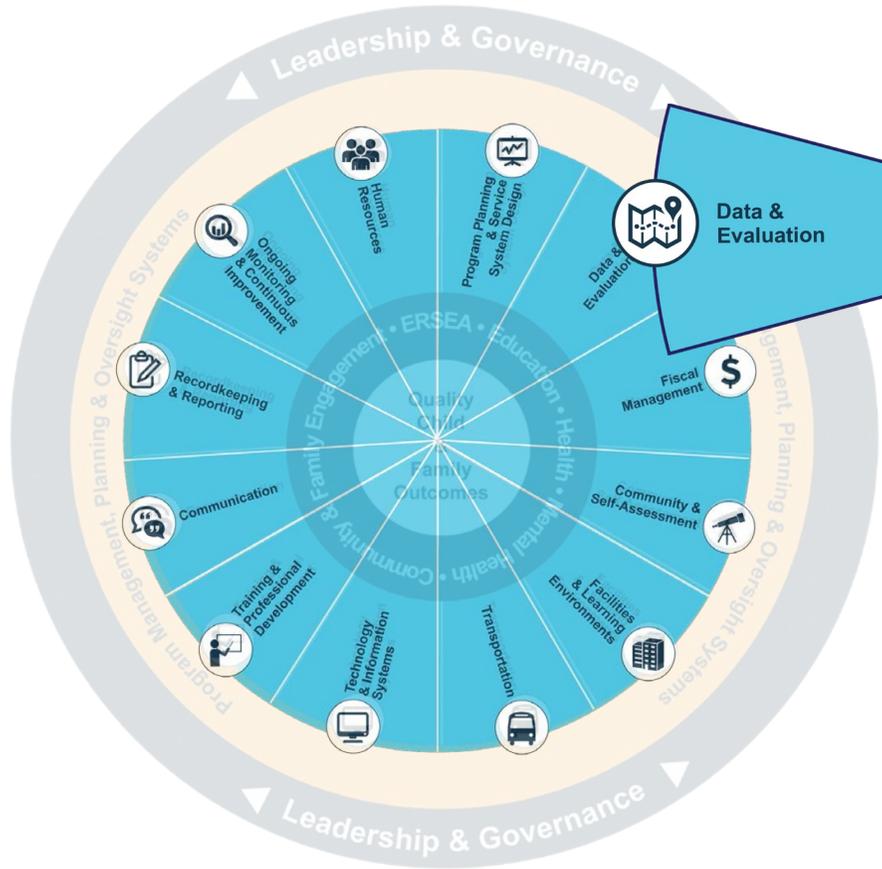
1305 - Definitions

Schedule Safety Huddles

The basic components of an effective safety huddle include:



Data & Evaluation

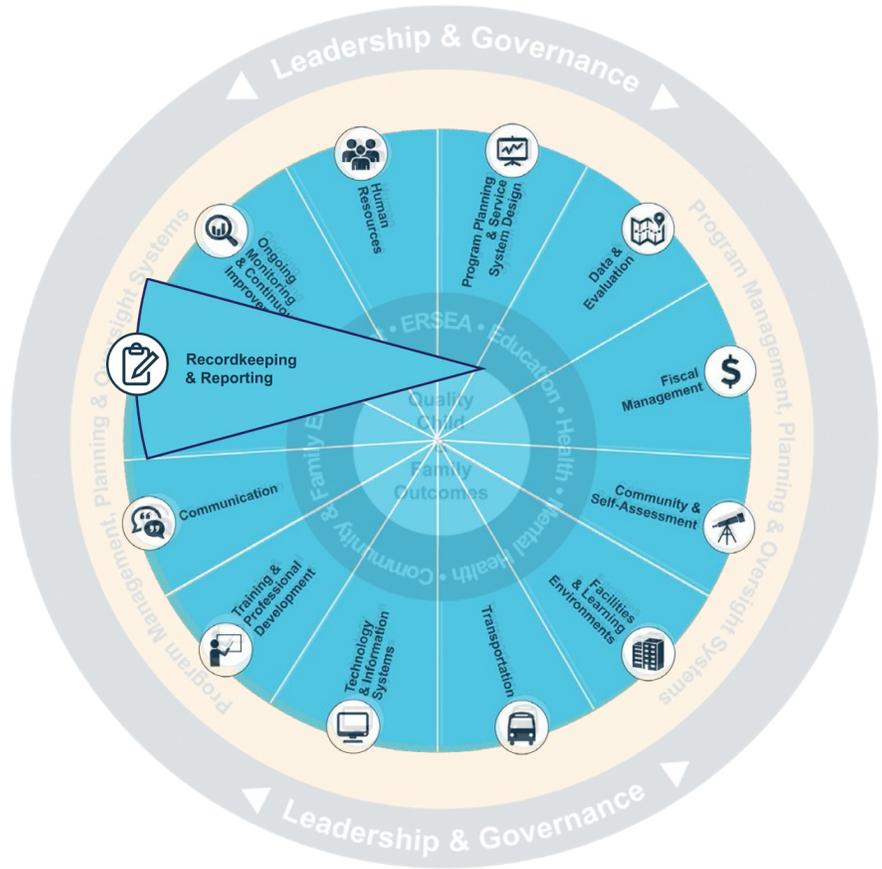


- Drives data-based decision-making
- Informs each stage of the program planning cycle
- Uses qualitative and quantitative measures to ensure effective program management

1302 Subpart J - 1302.101(b)(4)

1302 Subpart J - 1302.102(c)(1)(2)(i-v)

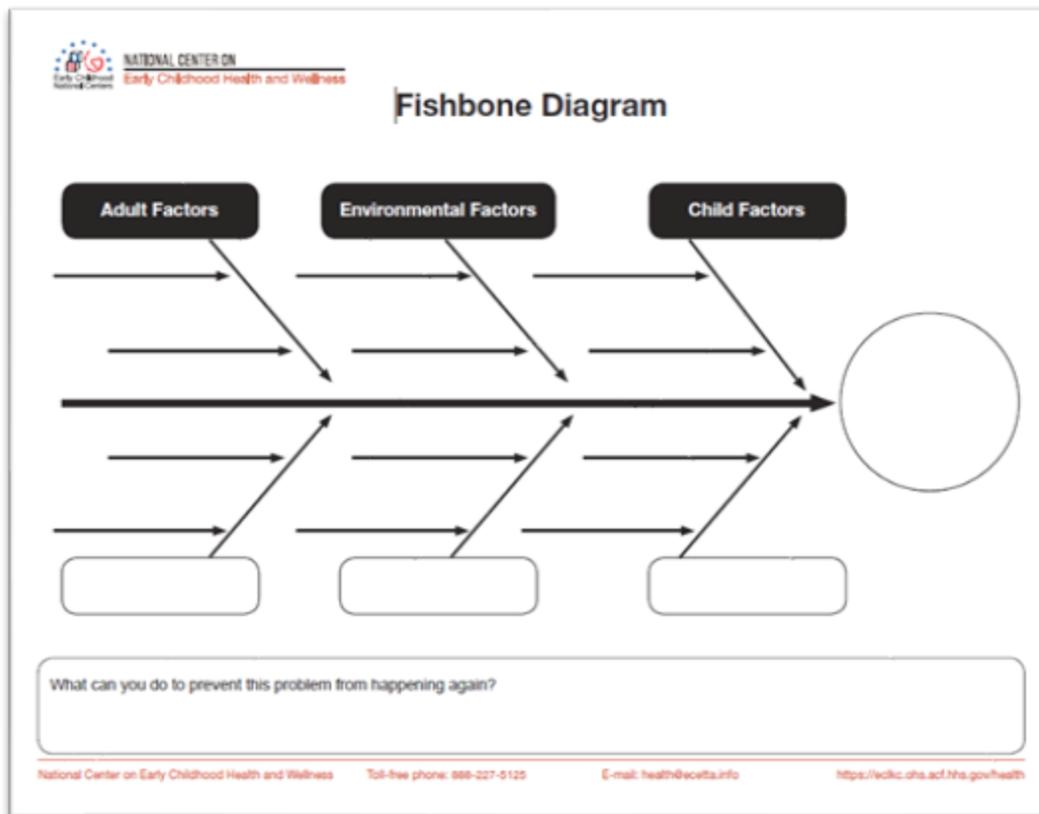
Recordkeeping & Reporting



- Builds and maintains a program's institutional memory
- Oversees and distributes strategic reports and recordkeeping activities
- Informs staff, leadership, and external partners

1302 Subpart J – 1302.102 (d)

1303 Subpart C – Protection for the Privacy of Child Records



Preventing Child Maltreatment in Head Start Programs Child Incident Scenario

INSTRUCTIONS
Read the scenario. At the end, you will find related questions for reflection based on your role. Take a moment to reflect on each question with your colleagues.

SCENARIO
During exploration time, a toddler, Brooklyn, was playing with some musical instruments. The lead teacher, Annie, asked Brooklyn to play with the instruments more quietly and showed her how to use the instruments correctly then walked away to attend to some other children. After several minutes of Brooklyn continuing to bang loudly on the instruments, the assistant teacher, Karen, said, "Ms. Annie told you to play with those instruments nicely. Quit being so dang loud!" Brooklyn quieted for a moment but then continued playing and exploring the instruments. Karen was sitting on the carpet reading books with other children. She appeared increasingly irritated by the noise. Karen grabbed Brooklyn by the arm and moved her around a shelf, which caused Brooklyn to trip, fall, and start crying. Karen said, "I'm so tired of you banging on those stupid things. I have a headache and am trying to read these books. Sit down!" Karen then aggressively put Brooklyn in a seated position to read books with other children. When Annie heard Brooklyn crying, she went over to the carpet to investigate. When Annie asked Karen what happened, Karen responded, "Nothing. Brooklyn just tripped and fell."

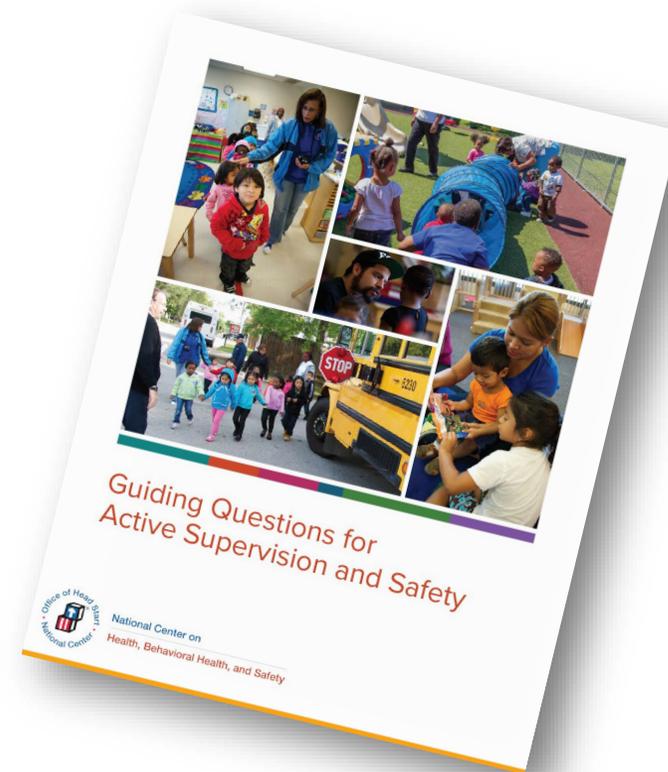
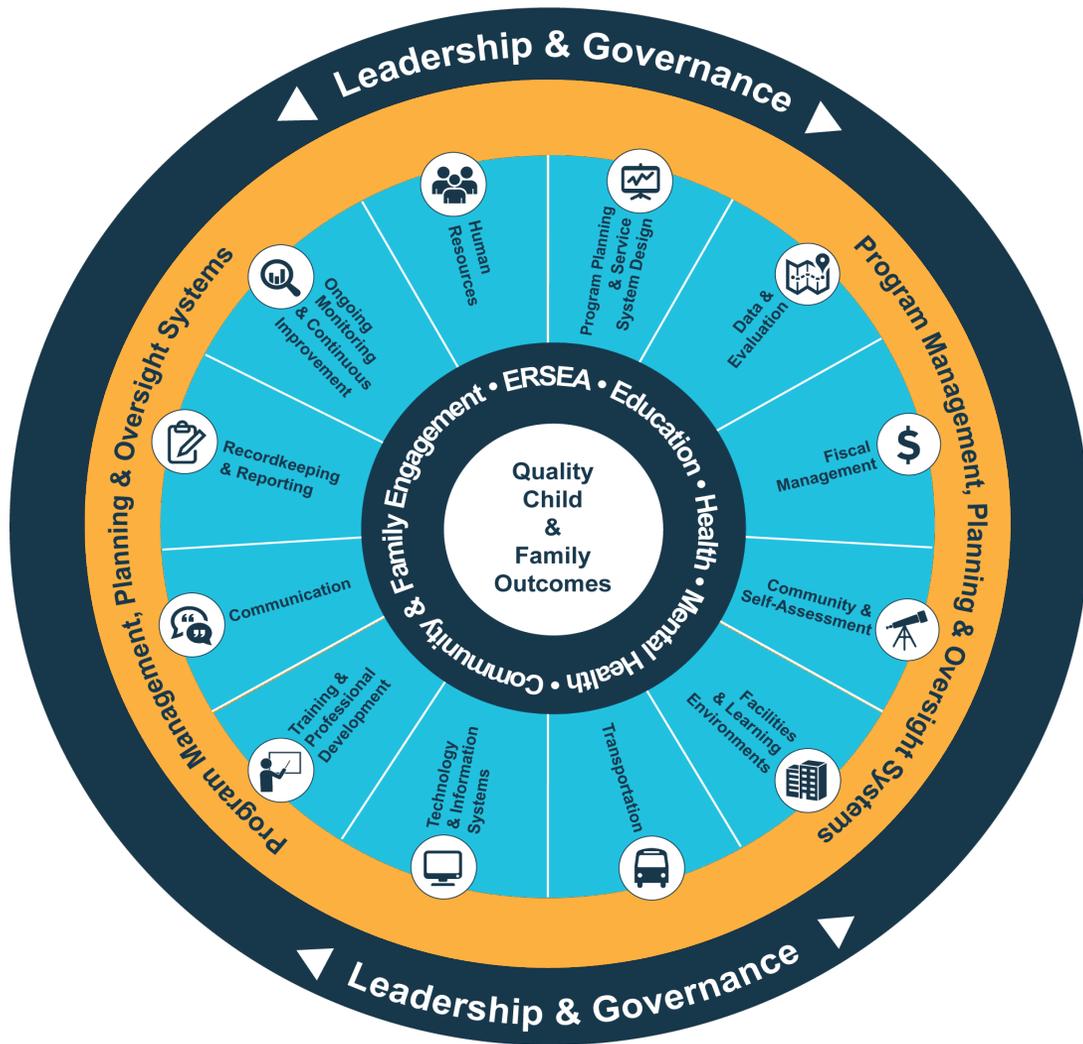
ADDITIONAL INFORMATION

PROGRAM

- The program has struggled to recruit and retain qualified staff.
- The Early Head Start classroom in which the incident occurred has had two lead teacher changes in the past year.
- The education manager and coach are frequently in the classrooms covering for staffing shortages.
- The program reported two additional child incidents in the past 12 months. Each occurred in two different sites: 1) a child was unsupervised by teachers on the playground for five minutes; 2) a teacher grabbed a child by the arm, leaving a bruise, to pull her off a slide (the child was climbing up the slide).

National Center on Health, Behavioral Health, and Safety | 888-227-5125 | health@ecvta.info | National Center on Early Childhood Development, Teaching, and Learning

Guiding Questions for Active Supervision and Safety



[Guiding Questions for Active Supervision and Safety | ECLKC \(hhs.gov\)](https://www.hhs.gov/eclkc)



Head Start Regional TTA Network

Activity

1

Program Management Systems & Active Supervision Assessment

Do the governing body/Tribal Council, Policy Council, and program management work together to make sure that children are safe when they are in our program's care?

Leadership and Governance	Always	Sometimes	Never	In process
1. We have a process in place to train and orient governing body/Tribal Council and Policy so they understand their oversight role includes responsibility for the safety of the children in our program.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. We have a process in place for the governing body/Tribal Council, Policy Council, and key management staff to support the development of program goals and measurable objectives that include effective health and safety practices.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. If there is a safety incident, we have a process in place to engage the governing body/Tribal Council and Policy Council in a corrective action process to ensure the problem does not occur again.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Do our program planning efforts guarantee effective safety practices?

Program Planning and Service System Design	Always	Sometimes	Never	In process
1. We have a process in place to address active supervision and child safety in our program planning.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. The management team, staff, Policy Council, and addresses child safety in our: <ul style="list-style-type: none"> Community Assessment Service Delivery System Goal Development and Measurement Coordinated Approaches Ongoing Monitoring Self-assessment 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. We have established roles and responsibilities for our stakeholders in designing services to keep children safe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Adapted from Guiding Questions for Active Supervision and Safety National Center on Health, Behavioral Health, and Safety

These materials were developed for OHS/Region XI Training and Technical Assistance Network under Contract No. 140D0420C0086 by ICF.

2

Leadership and Governance

How do we orient and train the governing body/Tribal Council and Policy Council so they understand their oversight role includes responsibility for the safety of the children in our program?

How do the governing body/Tribal Council, Policy Council, and key management staff communicate about active supervision and child safety?

3

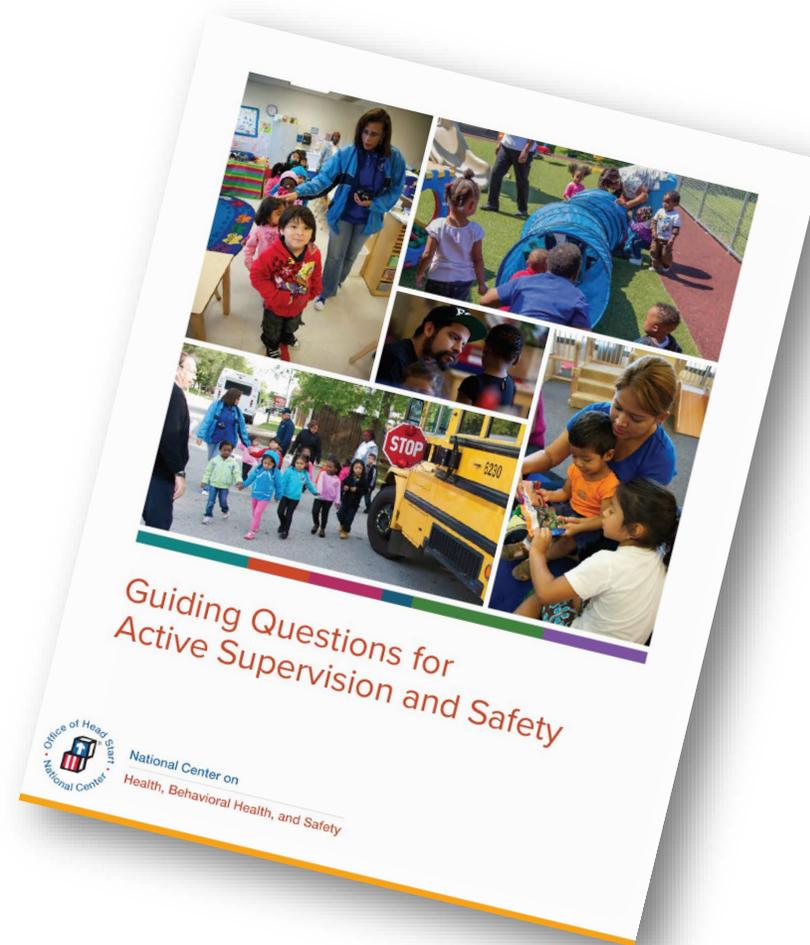
3. We respond when staff, consultants, or volunteers violate our program's standards of conduct related to child supervision.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Our approach to child supervision ensures that staff receive the support they need to keep children safe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Our program promotes staff wellness so staff can consistently focus on children's safety.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Next Steps	ACTION PLAN	
	Timeline	Person Responsible

Adapted from Guiding Questions for Active Supervision and Safety National Center on Health, Behavioral Health, and Safety



What is one new action you want to try to support safety in your program?



[Guiding Questions for Active Supervision and Safety | ECLKC \(hhs.gov\)](https://www.eclkc.gov/guiding-questions)

Thank you!

