



South Carolina Association of Community Action Partnerships

Early Head Start-Child Care Partnership

Policies and Procedures Manual

Updated October 1, 2018

Table of Contents

1. Program Governance	3
2. Management Systems	15
3. Human Resources	27
4. Employee Code of Conduct.....	81
5. Staff Training and Development	85
6. ERSEA- Eligibility, Recruitment, Selection, Enrollment and Attendance	93
7. Student Education and Health Records	N/A
8. Child Abuse and Neglect	107
9. Child Health and Developmental Services	118
10. Education and Early Childhood Development	173
11. Disability Services	192
12. Due to renumbering of an early draft, this manual contains no Section 12.....	216
13. Child Nutrition	217
14. Child Mental Health	237
15. Family and Community Partnerships	238
16. Due to renumbering of an early draft, this manual contains no Section 16.....	261
17. Financial Management Systems.....	262

1.0	<u>Program Governance Table of Contents</u>
1.1	Governance
1.2	Grantee Agency
1.3	Grantee Board
1.4	Policy Council
1.5	Internal Dispute Resolution
1.6	Community Grievance
17	Parent Committee
18	Reimbursement

Procedure Title:	Governance		
Procedure Number	1.1	Effective Date:	October 1, 2018
Policy Title Reference:	Governance		
Regulation References:	CFR45 1301.1, 1301.2, 1301.3		
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	IEHS-CCP Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP Early Head Start-Child Care Partnership Program (SCACAP EHS-CCP) will maintain a shared governance structure through which parents will participate alongside program staff, community members and the South Carolina Association of Community Action Partnerships Board of Directors (BOD, in its capacity as the grantee Governing Board) in policymaking and in other program decisions. South Carolina Association of Community Action Partnerships to School Readiness (hereafter "SCACAP"), as the Grantee Agency, will have ultimate legal responsibility and authority for managing Early Head Start grants and for ensuring the federally-compliant provision of Early Head Start services within the service area. Responsibility and authority for program direction and policy development will be shared between the SCACAP Board of Directors and the Policy Council.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships
 SCACAP EHS-CCP: South Carolina Association of Community Action Partnerships
 Early Head Start Child Care Partnership Policy Council: South Carolina Association of Community Action Partnerships Board of Directors

PROCEDURES

Parents of enrolled children will be offered the opportunity to participate in the Early Head Start Child Care Partnerships governance and decision- making process through participation in a Policy Council at the grantee level, and through participation in Parent Committees at the childcare provider partner/site level.

Program staff will support shared decision-making by providing policy groups with regular and accurate information regarding program planning, policy development and program operations. Open channels of communication will be maintained through regular reports from the program, exchange of minutes between groups, and opportunities for joint meetings and shared discussions on specific topics as requested.

The SCACAP Board of Directors/EHS-CCP and the Policy Council will share decision-making responsibility for the SCACAP Early Head Start program as outlined in the Head Start Performance Standards. The process of governance and decision-making will be implemented through 1) identification and clarification of specific issues; 2) collection of facts and consideration of program and individual values surrounding the issue; 3) development of alternative solutions; 4) identification of consequences of each alternative; 5) selecting an alternative (making a decision); and 6) evaluating the outcome of that decision.

The SCACAP Board of Directors and the Policy Council will be committed to making a good faith effort to resolve any differences in an amicable manner in order to avoid impasse. Should the SCACAP Board of Directors and the Policy Council fail to reach agreement on a course of action, and arbitration becomes necessary, both parties will resort to procedures outlined in the SCACAP Early Head Start Internal Dispute Resolution Policy 1.5.

Procedure Title:	Grantee Agency		
Procedure Number	1.2	Effective Date:	October 1, 2018
Policy Title Reference:	1.2- Grantee Agency		
Regulation References:	45CFR1301.2(b)		
Forms:	III		
SCACAP Executive Director Approval Date:	October 1, 2018	1m EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

The SCACAP to School Readiness Board of Directors (BOD) is the statutorily-authorized governing board of the grantee agency.

The SCACAP Board of Directors will assume the legal and fiscal responsibility for ensuring compliance with federal laws and regulations, including Early Head Start Performance Standards and state and local laws and regulations. As part of its legal and fiscal responsibility for the Early Head Start Child Care Partnerships (EHS-CCP) program, South Carolina Association of Community Action Partnerships to School Readiness will maintain an internal control system to safeguard federal funds and to comply with laws and regulations that impact financial statements.

DEFINITIONS

BOD: South Carolina Association of Community Action Partnerships Board of Directors
EHS-CCP: Early Head Start Child Care Partnerships

PROCEDURES

Funding Applications: The EHS-CCP Director will submit funding applications to the SCACAP Early Head Start Policy Council for approval and signature by the Council Chair. The application will then be forwarded to the SCACAP Board of Directors, as the recommendation of the Council, for review and final approval and required signatures. The Board Chair will sign the Grant Submission Form and all assurances submitted with the grant application.

Human Resources: SCACAP to School Readiness will advertise open, grantee-level positions within the Early Head Start grant. Local hiring will be conducted by contracted childcare partners and/or local SCACAP Partnerships with the advice and consent of SCACAP.

Financial Management: SCACAP will, under the supervision of the Chief Finance Officer/Chief Operating Officer, maintain internal controls to ensure fiscal accountability for Early Head Start funds. The SCACAP to School Readiness Board of Directors/Early Head Start Policy Council will review budget reports on a regular basis to ensure accountability and appropriate use of Early Head Start funds.

Contracts: The Early Head Start Director will consult with the Chief Finance Officer/Chief Operating Officer and Office Manager regarding necessary goods and services, which will be obtained in compliance with the SC Procurement Code. All contracts for goods and services will be forwarded to the Chief Finance Officer/Chief Operating Officer for review and signature.

Indirect Rate: The South Carolina Association of Community Action Partnerships will approve the Indirect Rate.

Grants Management: The Chief Finance Officer/Chief Operating Officer will verify the Indirect Rate and prepare financial reports PMS-272 and SF-269. See the SCACAP Early Head Start Financial Management Work Plan and Financial Reporting Policy 17.3.

Procedure Title:	Grantee Board		
Procedure Number	1.3	Effective Date:	October 1, 2018
Policy Title Reference:	1.3 -Grantee Board		
Regulation References:	45CFR1301.2(a-c)		
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

South Carolina Association of Community Action Partnerships Board of Directors (BOD), as the Grantee Agency’s statutorily authorized governing body shall be responsible for all governance responsibilities detailed in the Head Start Act. In order to ensure that these duties are executed comprehensively, the Board has delegated certain day-to-day governance of Policy Council who will serve as a liaison between the three groups. Actions will be communicated to and ratified by the SCACAP Board of Directors, which will retain ultimate responsibility for all fiscal, legal and logistical operations and will approve or disapprove program activities as detailed in Appendix A [45CFR 1304.50] of the Head Start Performance Standards.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships
EHS-CCP: Early Head Start Child Care Partnerships
BOD: SCACAP Board of Directors:
SCACAP

PROCEDURES

Required membership of the Board

A nine-member board of Directors governs the SC Association of Community Action Partnerships (SCACAP). Other key partners include the Governor’s Office Division of Economic Opportunity (OEO), and the SC Head Start Collaboration office. The State Association office also collaborates with the Southeastern Regional and National Associations of Community Action Agencies and Head Start programs and formalizes working relationships with other public and private partners including faith-based entities in materializing project activities.

Currently, SCACP is working with the South Carolina Division of Economic Opportunity, and the local community action agencies to adopt Result Oriented Management and Accountability management tool into their program activity.

Board of Directors; composition

1/3 Parents

1/3 Governance Elected Officials

1/3 Community members

The general responsibility of the Grantee Board will be to establish the direction of the program in accordance with the needs of the targeted population as identified in the Community Assessment, to regularly monitor fiscal operations, and to regularly examine program services to ensure that the mission and objectives of the program are realized. Operating responsibility will be delegated to the Early Head Start Child Care Partnerships Director.

The SCACAP Board of Directors will ensure a system for the annual performance review of the Early Head Start Child Care Partnerships Director by the due date of each program year. This evaluation will be conducted by SCACAP' EHS-CCP Director with input from the EHS Governance Council.

Oversight and approval responsibilities of the Grantee Board include:

- Procedures for program planning, including program philosophy and long and short-term program goals and objectives;
- Selection of service areas and criteria for defining recruitment, selection, and enrollment priorities;
- Funding applications and amendments to funding applications;
- Annual Report and dissemination of program information
- Annual self-assessment of the Early Head Start Child Care Partnerships program;
- Procedures for shared decision-making with policy groups, including composition of policy groups, procedures by which members are selected, and policies that define management functions and the roles and responsibilities of the governing body;
- Internal dispute resolution procedures, including impasse procedures and the resolution of complaints about the program;
- Assure that internal controls are in place to safeguard federal funds;
- Program Personnel Policies including Standards of Conduct; and
- Decisions to hire or terminate the EHS-CCP Director.

Procedure Title :	Policy Council		
Procedure Number	1.4	Effective Date:	October 1, 2018
Policy Title Reference:	1.4 - Policy Council		
Regulation References:	45CFR1301.3(b)(c)		
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

South Carolina Association of Community Action Partnerships to School Readiness (SCACAP) will establish a grantee-level Policy Council responsible for interpreting the needs of the community. At least 51% of Policy Council members must be parents of currently enrolled children. Membership on the Policy Council will be limited to a total of five, one-year terms. In order to avoid conflict of interest, no staff member of SCACAP, nor members of their immediate families, may serve on the Policy Council in a voting capacity. Parents who occasionally serve as substitutes may continue to serve on Policy Council.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships to School Readiness

PROCEDURES

Membership of the Policy Council will be made up of:

- a. Parent Representatives. A minimum of at least 51% of the Policy Council shall be Parent Representatives. Every Parent Representative must be a parent or legal guardian of a child currently enrolled in EHS. Parent representatives may continue serving on Policy Council after their children have transitioned from Early Head Start, within the defined Term Limits.
- b. Community Representatives. A maximum of 49% of the Policy Council shall be Community Representatives, including:
 - One (1) member nominated by SCACAP from the parent representatives
 - Others who are drawn from the local community: businesses; public or private community, civic, and professional organizations; and others who are familiar with resources and services for low-income children and families, including for example the parents of formerly enrolled children.

Members will not have a conflict of interest with supporting the Policy Council and EHS program, and will adhere to the Standards of Conduct Policy.

Members will be encouraged to obtain a criminal record check. Fees associated with obtaining the criminal records check will be paid for by SCACAP.

Parent members of the Policy Council will be elected annually from their respective centers and classrooms, and will continue to serve on the Council until the next Council has been elected and seated the following year. Parent representation on the Policy Council will be determined in accordance with Policy Council By-Laws; Membership.

Volunteer members from the local business, civic and professional community, or individuals who are familiar with resources and services for low-income children and families, including parents of formerly enrolled Early Head Start children, will be selected annually to serve on the Policy Council. Policy Council members, Grantee Board members, or Program Staff may recommend individuals to serve as Community Representatives.

Community representation on the Policy Council will be determined in accordance with Policy Council By-Laws;

Membership.

Policy Council will work in partnership with key management staff and the Board of Directors to develop, review and approve or disapprove policies. Policy Council will serve in a leadership capacity with direct links to the Parent Center Committees, SCACAP' Early Head Start Child Care Partnerships and the communities they serve. Policy Council, in collaboration with the Board of Directors, will have direct responsibility for establishing and maintaining procedures for working with the Grantee Board to resolve community complaints about the program.

To facilitate the sharing of information, at least one member of the Policy Council will act as a liaison to the Board of Directors.

Policy Council Bylaws will cover purpose, responsibilities, meeting format, membership and duties of officers. Bylaws will be reviewed annually and updated as necessary to ensure accuracy. Specific responsibilities of the Policy Council are detailed in the Head Start Performance Standards.

Procedure Title:	Internal Dispute Resolution		
Procedure Number	1.5	Effective Date:	October 1, 2018
Policy Title Reference:	1.5 - Internal Dispute Resolution		
Regulation References;	45 CFR Part(s): 1301.6(a-c)		
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

The SCACAP Board of Directors (BOD), representing the Grantee Agency, and the Policy Council will make a good faith effort to resolve any differences on an amicable basis so as to avoid impasse and having to enter into mediation procedures provided below. In the event that mediation becomes necessary, the BOD and the Policy Council are committed to cooperate fully and completely in all respects with the Mediation Committee's efforts to resolve the impasse. The Regional Head Start Office will be notified as soon as possible that there is a conflict between the Grantee Agency and the Policy Council, especially when the conflict if not resolved, could lead to termination, or denial of funding, of the Early Head Start grant.

DEFINITIONS

Impasse is defined as a deadlock that occurs when a Grantee Agency and its Policy Council cannot reach agreement on a proposed action.

SCACAP: South Carolina Association of Community Action Partnerships

BOD: SCACAP Board of Directors

EHS-CCP: Early Head Start Child Care Partnerships

PROCEDURES

STEP ONE: The SCACAP Board of Directors and the Policy Council will first return to the procedure for shared decision-making and attempt to resolve the conflict through joint 1) identification and clarification of issues; 2) collection of facts and consideration of program priorities and policies; 3) development of alternative solutions; 4) identification of consequences; 5) making a decision; and 6) evaluating the outcome of that decision. If agreement cannot be reached in this way, Policy Council and the Board will proceed to:

STEP TWO: The SCACAP Board of Directors and Policy Council will each select one representative from their membership, and those two individuals will select a third person who is not associated with Early Head Start Child Care Partnerships or the Grantee Agency to serve as a Mediation Committee, the purpose of which is to attempt to resolve the issues between the grantee and the Policy Council to the mutual satisfaction of both parties. Members of the Mediation Committee will have the delegated authority to represent their respective membership and to bind the Council and Board to the decision reached by the Committee. If agreement cannot be reached in this way, within fifteen (15) days, the grantee will proceed to:

STEP THREE: The grantee agency will submit the dispute to the offices of a professional arbitrator and advise the Regional Office of the date, time and location of the first meeting. The SCACAP Board of Directors and the Policy Council will be expected to attend any meetings requested by the arbitrator. If the conflict relates to refunding, arbitration must be completed fifteen (15) days prior to the refunding date. Refusal of either party to engage in arbitration will result in the Regional Office bringing about arbitration. Arbitration is binding and final.

All costs of mediation and arbitration will be paid out of SCACAP EHS-CCP grant funds.

Procedure Title:	Community Grievance		
Procedure Number	1.6	Effective Date:	October 1, 2018
Policy Title Reference:	1.6 – Community Grievance		
Regulation References:	45CCFR1302.34(b)		
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP will make every effort to resolve differences of opinion that may occur between the program and enrolled families or citizens of the community. Unresolved concerns will be brought to the Policy Council and SCACAP Board of Directors for resolution of the problem.

DEFINITIONS

SCACAP EHS-CCP: South Carolina Association of Community Action Partnerships, Early Head Start Child Care Partnerships

PROCEDURES

A grievance is a written statement that the laws, rules, policies, or procedures under which the SCACAP Early Head Start Child Care Partnerships program operates may have been violated. A grievance may include: 1) disagreement over a decision to accept a family into the program; 2) disagreement over the goals and methods of the program; 3) unresolved conflict with SCACAP EHS-CCP staff; 4) concern that SCACAP EHS-CCP has failed to keep an agreement; 5) concern that Early Head Start had not complied with the Head Start Performance Standards; or 6) concern that the SCACAP EHS-CCP program did not follow approved policy.

SCACAP EHS-CCP parent concerns should be discussed with the staff person most directly involved with the concern. If no resolution is reached, the concern will be taken to the Early Head Start Director. Community concerns regarding the program will be brought directly to the Director. The Director will hear any concerns and follow up with an investigation of the situation if necessary. The Director will then provide a written response within ten (10) days of the meeting.

If not satisfied with the Director's response, a written grievance will be submitted to the Chairperson of the SCACAP EHS-CCP Policy Council within 30 days of the Director's written response. Written grievances must include: 1) date; 2) name, address, and telephone phone number of the grievant; 3) a description of the problem; 4) date of the concern; 5) description of what has already been done to resolve the concern or complaint; 6) how the grievant would like to see the problem resolved; and 9) signature. Assistance can be provided in preparing this written grievance if requested.

Upon the receipt of an appropriate written grievance, the Chairperson of the SCACAP EHS-CCP Policy Council will contact the Chair of the SCACAP Board of Directors and schedule a hearing of the grievance. The person filing the grievance and any other involved parties will be notified of the date, time, and location of the hearing.

Policy Council, in collaboration with the Grantee Board, will submit a written response to the person filing the grievance within thirty (30) days of meeting. The decision of the Early Head Start Child Care Partnerships Policy Council and SCACAP Board of Directors is final.

Procedure Title:	Parent Committee		
Procedure Number	1.7	Effective Date:	October 1, 2018
Policy Title Reference:	1.7- Parent Committee		
Regulation References:	45CFR1301.4(a-b)		
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

A Parent Committee will be established in each center to provide all parents of children enrolled in the Early Head Start Child Care Partnerships program with a broad range of opportunities to participate in the shared decision-making process. Only parents of children currently enrolled in an Early Head Start Child Care Partnerships classroom will have voting privileges in a Parent Committee.

DEFINITIONS

EHS-CCP: Early Head Start Child Care Partnerships
 BOD: SCACAP Board of Directors

PROCEDURES

Each Early Head Start Child Care Partnership Center will operate its own Parent Committee, elect officers for the year, and conduct its own business. Individual Parent Committees may develop bylaws to direct their group process based on guidelines provided by the program. Each Parent Committee will be able to access moneys, as applicable, budgeted out of program funds for parent activities. A staff member will be available as an advisor to the group, will attend all meetings, but will not vote.

Parent Committees will contribute to the development of the program's curriculum and approach to child development and education, and will advise staff in developing and implementing local program policies, activities and services. The staff advisor will relay recommendations for classroom curriculum and activities to the teaching team.

Recommendations for program-wide policy and procedure will be relayed to the Policy Council through the center representative to Policy Council. Minutes from Policy Council and Board of Directors Meetings will be available in all centers and will be shared between the BOD and Policy Council. The Policy Council Representative to the EHS-CCP will relay center recommendations and input to the BOD.

Parents, through involvement in the Parent Committee, will have the opportunity to participate in the identification and location of local resources, in the recruitment of children and families into the program, and in the recruitment and screening of program staff. The Parent Committee format will also provide parents with the opportunity to meet with other parents and community members who share a common interest, and to develop program activities such as educational experiences and social events specifically designed to meet the needs of local children and families.

Procedure Title:	Reimbursement		
Procedure Number	1.8	Effective Date:	October 1, 2018
Policy Title Reference:	1.8 - Reimbursement		
Regulation References:	45CFR1301.3(e)		
Forms:		III	III
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

In order to enable low-income parents to participate fully in their group responsibilities, reimbursement will be provided, if necessary, for reasonable expenses incurred by members of policy and parent groups in the performance of their official Early Head Start duties.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

PROCEDURES

Childcare will be provided at the center during Parent Meetings held at the center. Childcare reimbursement may also be provided for the following out-of-town activities: Policy Council Meetings; State Head Start Meetings; and other activities as approved by Policy Council.

Childcare reimbursement for out-of-town SCACAP Early Head Start Child Care Partnerships meetings will be approved for ten (10) hours per day. If this limitation is a hardship for any Policy Council member, they may request reimbursement for additional hours by written request to the Policy Council Chairperson. This request will be voted on at the next Policy Council meeting.

Transportation to Policy Council meetings will be reimbursed at the rate set by the SCACAP Early Head Start Child Care Partnerships Program. Reimbursement may be provided for the following activities: Policy Council Meetings; Policy Council Planning Committee Meetings; Self-Assessment Activities; and SCACAP Early Head Start Child Care Partnerships Program Meetings. Only one car per center will be reimbursed for each meeting, or one car for each four (4) people. Any exception to this limitation must have prior Policy Council approval.

It is the responsibility of the driver to carry documentation of valid liability insurance as required by SC law, and to ensure that seat belts are available and used by all passengers.

The SCACAP Early Head Start Child Care Partnerships program will cover the costs of parents who attend SCACAP Early Head Start Child Care Partnerships trainings and conferences. Registration fees and lodging will be paid by purchase order prior to the trainings. Parents will be reimbursed money to cover the costs of mileage and food at the rate set by the SCACAP Early Head Start Child Care Partnerships Program.

- 2.0 Management Systems Table of Contents
- 2.1 Program Planning
- 2.2 Communication
- 2.3 Record Keeping, Meetings and Reporting
- 2.3 Supervision and Monitoring
- 2.S Record Retention Guidelines and Location of Storage

Procedure Title:	Program Planning		
Procedure Number	2.1	Effective Date:	October 1, 2018
Policy Title Reference:	2.1 - Program Planning		
Regulation References:	45CFR 130 2.102(a-c);1302 .ll (b)(l -3)		
Forms:	III		
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP will implement a systematic, ongoing process of program planning that involves program staff, parents, Policy Council, the Early Head Start Child Care Partnerships, SCACAP BOD and the community. Information will be gathered from a variety of sources, analyzed and used to inform the direction of program services. Program planning efforts will focus on providing quality services in the most cost-effective manner.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships
EHS-CCP: Early Head Start Child Care Partnerships
BOD Board of Directors

PROCEDURES

Community Assessment:

A full Community Assessment will be completed every five years to coincide with the annual federal grant application. The Community Assessment process will be used to identify the following:

- *The number of eligible infants and toddlers in each geographic area, including their race, ethnicity, and languages that they speak. This will also include children experiencing homelessness, children in foster care, and children with disabilities.
- *The education, health, nutrition, and social service needs of these children and their families will be identified.
- *Typical work, school, and training schedules of parents with eligible children
- * Other child development programs that serve eligible children
- * Resources that are available in the community to support these families
- * The strengths of these communities

Eligibility and Recruitment Plan:

An Annual Eligibility and Recruitment Plan will be developed using the Community Assessment updates. Annual updates will reflect any changes in resources, services and/or demographics.

Program Self-Assessment:

A Program Self-Assessment will be conducted annually. All staff and participating parents, Board, Policy Council and community members will be provided training on the self-assessment instrument and plan. Assessment teams will collect data that will then be summarized by team leaders and reviewed by management staff. The Self-Assessment Summary will reflect program strengths and areas for improvement.

The EHS-CCP Management Team will review the Self-Assessment Summary and develop a plan of action. Corrective action will be taken immediately and will be reflected in the next year's program operations and training plan. Policy Council will review and approve the Self-Assessment Plan, the Self-Assessment Summary, the Program Improvement Plan, and will

monitor completion of required corrective action. The SCACAP Board of Directors will also review the results of the Self- Assessment and will monitor completion of any corrective action.

Strategic Planning:

Strategic planning will be an ongoing process involving program staff, parents, EHS Health and Education Advisory Boards, SCACAP Board of Directors and Policy Council. Information from a number of sources, including child outcome data, will be used to develop and prioritize program goals and objectives that further impact program model, training and budget.

Considerations for determining program modifications and staffing patterns will include state and federal mandates, funding levels, family needs, and personnel issues. The annual training plan will address state and federal mandates and initiatives, program needs, center needs, and individual staff needs.

The planning process culminates in the compilation and submission of the annual federal grant application after approval by the Policy Council and SCACAP Board of Directors. Implementation of the grant, as driven by program planning efforts, consists of development of and implementation of written program plans, policies and procedures, and purchase of materials, equipment and facilities.

Procedure Title:	Communication		
Procedure Number	2.2	Effective Date:	October 1, 2018
Policy Title Reference:	2.2 – Communication		
Regulation References:	45CFR 1302.41(a);1302.90(d)		
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP will ensure that timely and accurate information is provided to parents, staff, Policy Council, the Early Head Start Child Care Partnership Management Team, the SCACAP BOD and relevant community partners, and that effective, comprehensive two-way communication is carried on between program staff and parents on a regular basis. Whenever possible, communication with families will be carried out in the parent's primary language, and every attempt will be made to provide communication assistance to individuals with sensory impairments.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships
 EHS-CCP: Early Head Start Child Care Partnerships
 BOT: Board of Directors

PROCEDURES

Two-way communication with families will be ongoing throughout the program year. This may include:

- Regularly scheduled home visits, parent-teacher conferences, and trainings
- Participation in additional scheduled meetings (e.g. IFSP, Behavior Plan)
- One-on-one conversations in the center or in the parent's home
- Telephone calls

Program staff members will also communicate with families in writing, including but not limited to:

- Notes home, including handouts and informational flyers
- Program Newsletters
- Letters

Communication with Policy Council and the SCACAP Board of Directors will include:

- Information shared verbally during regularly scheduled meetings
- Shared meeting minutes between Policy Council and SCACAP Board of Directors
- Policy Council representation on the SCACAP Board of Directors EHS- CCP Governance Council
- Sharing of pertinent communications from the Office of Head Start
- Program progress reports, policies, planning schedules, financial reports
- Head Start grant applications

Regularly scheduled meetings between and among direct service and management staff will be utilized to facilitate communication among program staff. Further sharing of verbal and written information will be done through:

- Meeting minutes, monthly reports, tracking forms and other documents sent by mail, e-mail and/or fax
- Provision of Head Start Performance Standards, written plans, Policies and Procedures, forms, and written guidance
- E-mail, telephone calls, texts, and/or voice mail messages

- Program website
- Personal communication, conferences, and performance evaluations

All communication is potentially sensitive and will be conducted in accordance to program policies on confidentiality. The table below shows the steps in initiating drafts of communications to our various partners.

Procedure Title:	Record Keeping, Meetings and Reporting		
Procedure Number,	2.3	Effective Date:	October 1, 2018
Policy Title Reference;	2.3 - Record Keeping, Meetings and Reporting		
Regulation References:	45CFR1302.101; 1302.102(c,d); 1303.24(a-c)		
Forms,			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
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POLICY

SCACAP will maintain a record-keeping system that will document the status of all program activities and direct staff action in accordance with Performance Standards, program work plans and policies. Personally identifiable information about enrolled children and families will be limited to data that is essential for the assessment, planning, service provision, and evaluation of progress made by children and families toward achievement of identified goals or developmental milestones. Information will be documented, stored, and accessed in a manner that will provide appropriate program staff with accurate and timely information to ensure the provision of quality services and to demonstrate program accountability.

Statistical data **will be** used in **a way** that does not permit personal identification of parents or students. All information will be kept in confidence. SCACAP will not disclose any personally identifiable information without the parent's prior written consent (signed and dated), except as otherwise stipulated in Policy.

Responsibility and accountability for the maintenance of specific records is assigned to program staff based on Job Description and content-area expertise.

SCACAP will maintain data collection and reporting systems to ensure fiscal accountability, program quality and accountability, and inform governing bodies and program staff of program status and progress. This reporting system will be sufficient to generate official reports for federal, state, and local authorities, as required by applicable law.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

PROCEDURES

Records

Record	Location	Staff Responsible
Grant Application (Grant Notebook)	SCACAP	EHS Director
Notice of grant award	SCACAP	EHS Director
Community Assessment	SCACAP	EHS Director
Long-range goals; short-term objectives	SCACAP	EHS Director, Center Directors
Written Plan for program services	SCACAP	Content Area Experts
School Readiness Plan	SCACAP	ED. Coordinator
Grantee Profile	SCACAP	EHS Director

Health Advisory Committee Minutes	SCACAP	Health Coordinator
Grievance procedure for parent or community complaints (Parent Handbook)	SCACAP	EHS Director
Most recent Self-Assessment (including description of procedures, results, and actions in response to results)	SCACAP	EHS Director
Ongoing monitoring instruments, reports and corrective action documents - last 12 months	SCACAP	Area Coordinators
Recruitment/enrollment information (including policies/procedures, attendance records, and enrollment/waiting list information)	SCACAP	EHS Director
CCP contracts	SCACAP	EHS Fiscal Manager
Bylaws	SCACAP	EHS Director
Membership list	SCACAP	EHS Director
Minutes for last 12 months	SCACAP	EHS Director
Information on policies/procedures related to governance	SCACAP	EHS Director
GOV	Location	Staff Responsible
Membership list (including roles and responsibilities of members)	SCACAP	EHS Director
Minutes for last 12 months	SCACAP	EHS Director
Impasse procedure	SCACAP	EHS Director
Organizational chart or list of staff and function of each staff person, vacancies	SCACAP	EHS Director
Job descriptions	SCACAP	EHS Director
Personnel policies (including policies and procedures pertaining to confidentiality)	SCACAP	EHS Director
Salary schedule	SCACAP	EHS Director
Staff personnel files including health records	SCACAP	EHS Director
Staff performance evaluations	SCACAP	EHS Director
Staff development and training approach	SCACAP	EHS Director
Training and technical assistance plan	SCACAP	EHS Director
Records of all training provided	SCACAP	EHS Director
Center Activity	Location	Staff Responsible
Menus	Posted at CCPs	Health Coordinator
Daily classroom schedule	CCPs	Teachers
Class rosters	CCPs/ChildPlus	Teachers
General information supplied to parents	Parent Handbook	Family Advocates
Information on use of volunteers	Volunteer Handbook	CCP Directors
Schedules of parent meetings and topics	Volunteer Handbook	CCP Directors
Ongoing assessment of progress	TS Gold/Paper	Teachers
Screening and health care records	Child File @ SCACAP	Family Advocate
Emergency contact information	Child File@ CCP/SCACAP	Family Advocate
Individualized Family Service Plan (IFSP)	Child File@ CCP/SCACAP	Teachers/Family Advocate
Food and/or health allergies	Child File@ CCP/SCACAP	Teachers/Health Coordinator

Record	Location	Staff Responsible
Conversation or anecdotal notes	Child File@ CCP	Teachers
Description of family goals and progress	Child File@ CCP/SCACAP	Teachers/Family Advocate
Documentation of home visits and parent/teacher Conferences	Child File@ CCP/SCACAP	Teachers/Family Advocate
Documentation of parent involvement	Parent Involvement File	Family Advocate
Enrollment/income eligibility forms	Eligibility Determination Form in Child's File @ SCACAP	ERSEA Manager
PROCEDURES	Location	Staff Responsible
Medication administration (Policy)	CCPs/SCACAP	Health Coordinator
Short-term exclusion (-Policy)	CCPs/SCACAP	Health Coordinator
Emergency procedures (Policy)	CCPs/SCACAP	Health Coordinator
Child abuse/neglect reporting (Policy)	CCPs/SCACAP	Health Coordinator
Equipment maintenance logs	CCPs/SCACAP	Fiscal Manager
Results from environmental tests and/or safety Inspections	CCPs/SCACAP	Health Coordinator
Hazardous material (e.g., blood, human waste) disposal policies	CCPs/SCACAP	Health Coordinator
Child care	CCPs/SCACAP	CCP Director/Health Coordinator
Sanitation	CCPs/SCACAP	CCP Director/Health Coordinator
Fire/safety	CCPs/SCACAP	CCP Director/Health Coordinator
Food handlers	CCPs/SCACAP	CCP Director/Health Coordinator
Other (as required under applicable State or local regulations)	N/A	N/A
Record	Location	Staff Responsible
Administrative costs documentation	SCACAP	Fiscal Manager/CFO
Audit report for past 3 years	SCACAP	Fiscal Manager/CFO
Bank reconciliation	SCACAP	Fiscal Manager/CFO
Chart of accounts	SCACAP	Fiscal Manager/CFO
Current contracts and agreements	SCACAP	Fiscal Manager/CFO
Current indirect cost agreement	SCACAP	Fiscal Manager/CFO
Department of Agriculture (USDA) accounting records	SCACAP	Fiscal Manager/CFO
Detailed general ledger of accounts payable (AP) disbursements journal	SCACAP	Fiscal Manager/CFO
Financial Assistance Awards (FM)	SCACAP	Fiscal Manager/CFO
Financial reports to governing bodies	SCACAP	Fiscal Manager/CFO
Grantee charter document	SCACAP	Fiscal Manager/CFO
Grantee's most recent IRS 990	SCACAP	Fiscal Manager/CFO
Insurance policies	SCACAP	Fiscal Manager/CFO
Lease agreements	SCACAP	Fiscal Manager/CFO
Monthly trial balances	SCACAP	Fiscal Manager/CFO
Most recent SF-269 and PMS-272	SCACAP	Fiscal Manager/CFO
Non-Federal share documentation	SCACAP	Fiscal Manager/CFO

Organizational Chart	SCACAP	Fiscal Manager/CFO
Payroll journal	SCACAP	Fiscal Manager/CFO
Fiscal Policies and Procedures	SCACAP	Fiscal Manager/CFO
Procurement policies	SCACAP	Fiscal Manager/CFO
Program budget planning documents	SCACAP	Fiscal Manager/CFO
Property inventory and files for recent major purchases	SCACAP	Fiscal Manager/CFO
Vendor contracts	SCACAP	Fiscal Manager/CFO
Written accounting procedures	SCACAP	Fiscal Manager/CFO

Meetings will be held on the following schedule:

<u>Group</u>	<u>Composition</u>	<u>Frequency of Meetings</u>	<u>Who Sets Agenda Meeting</u>
BOARD OF DIRECTORS	<u>Statutory</u>	<u>Bi-Monthly</u>	Board Chair, Director
POLICY COUNCIL	EHS Governance Council Charter	Bi-monthly	Council Chair, EHS-CCP Director
Policy Council	Parents, Communities. Partners	10x annually	Chair, EHS-CCP DIRECTOR, ERSEA Manager
EHS Leadership Team	Executive Director, EHS-CCP Director, Fiscal	Twice monthly	EHS-CCP Director
SCACAP Management Team	Executive Director, EHS-CCP Director, QA, and all SCACAP staff with Supervisor roles	Twice monthly (alternate weeks)	Executive Director, EHS-CCP Director
EHS Management Team Meeting	EHS-CCP Director and Coordinators	2 nd Tuesday at 12:30 to 3:30, Monthly (In person)	EHS-CCP Director
EHS Management Team Calls	EHS-CCP Director and Coordinator	Daily As Needed	EHS-CCP Director
ERSEA/Health Team Meeting	ERSEA Coordinator, Health Coordinator, and Family Advocates	2 nd Thursday at 10:00 to 2:00, Monthly (In person)	ERSEA Coordinator, Health Coordinator, EHS-CCP Director
ERSEA Team Meetings and Calls	EHS-CCP Director, Family Advocates	Individual call daily (as needed)	ERSEA Coordinator
School Readiness Team	Education Coordinator and Teacher Mentors	Monthly (in person)	Education Coordinator EHS-CCP Director
CCP Directors Meetings	EHS-CCP Director, Education Coordinator, Health Coordinator, CCP Directors, Fiscal, Local Partnership Directors	Monthly Conference	Education Coordinators, EHS-CCP Director
Staffing	Coordinators with each direct report	Monthly	Coordinators

Procedure Title:	Supervision and Monitoring		
Procedure Number,	2.4	Effective Date:	October 1, 2018
Policy Title Reference;	2.4 Supervision and Monitoring		
Regulation References:	45CFR1302.102 (b,c)		
Forms,			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP will implement a system of supervision and monitoring throughout all levels of program operation designed to foster reflective practice. The roles of Teacher Mentors and Family Advocates will be emphasized to foster team building across a large program geography and minimize isolation.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships
EHS-CCP: Early Head Start Child Care Partnerships
CCP: Child Care Partners

PROCEDURES

The EHS-CCP Management Team will provide ongoing monitoring and supervision of CCPs within their assigned areas of responsibility. Monitoring will be carried out through the use of regularly scheduled on-site center observations, observing of teachers in the classroom setting, review of monthly center reports, tracking forms, reports generated by web-based or software programs, fiscal reports, meeting minutes, review of child and family files, and center records. The EHS Management Team will participate in comprehensive staffing with every classroom team, which will include assurance of an annual performance evaluation of each EHS teacher annually. The EHS-CCP Management Team will provide center directors with formal feedback as part of this performance evaluation process.

The EHS-CCP Director will provide ongoing supervision of EHS-CCP Management Staff. Monitoring will be carried out through the use of monthly reports, regularly scheduled meetings in person or by phone and with the Management Team, fiscal reports, meeting minutes, and periodic review of tracking forms, and reports generated by web-based or software programs. The EHS-CCP Director will occasionally visit centers and attend center meetings and other program activities in addition to regular monitoring activities.

Procedure Title:	Record Retention Guidelines and Location of Storage		
Procedure Number,	2.5	Effective Date:	October 1, 2018
Policy Title Reference;	2.5 - Record Retention Guidelines and Location of Storage		
Regulation References:	45CFR130354;1302.12		
Forms,			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

All EHS-CCP policies and procedures, personnel, fiscal, and governance records will be maintained by SCACAP in an orderly, safe, and confidential manner. Records for childcare partners will be maintained both centrally at the SCACAP office and at the childcare sites.

DEFINITIONS

EHS-CCP: Early Head Start Child Care Partnership

SCACAP: South Carolina Association of Community Action Partnerships

PROCEDURES

Clear guidelines for reporting responsibility and schedule for submission of reports and documentation will be provided to program staff at the beginning of the year during Pre-Service training. Monthly reporting forms will specify documentation and information to be sent to Coordinators.

- Center Directors will be responsible for ensuring the completion of monthly reports for submission to the EHS Fiscal Manager by the 5th of each month unless it immediately follows a holiday.
- The EHS- CCP Program Assistant will distribute reports to content area experts as appropriate.
- Content area experts will analyze data from reports and submitted documents, and provide feedback to CCPs as to the status and/or quality of required activities to ensure timely completion of services for children and families. Content area experts will provide monthly reports to the EHS Director, including but not limited to, summarized CCP data, direct observations and ChildPlus reports.
- The EHS Director will review data from content area experts and will provide feedback to each, utilizing data to guide planning efforts, and inform the SCACAP Board of Directors via the Director, Policy Council, and OHS of program progress.

Regular reporting to the SCACAP Board of Directors via the Director and OHS will include financial reports and the annual federal Program Information Report (PIR). Information collected in the PIR will be used to inform the public about these programs and to make periodic reports to Congress about the status of children in Early Head Start programs as required by Head Start.

<i>Record</i>	<i>Retention</i>	<i>Responsibility</i>	<i>Notes/Comments</i>
Advisory Board Records	10 Years	Health & Education	SCACAP EHS-CCP Office
Audit Records	20 Years	Fiscal	Administrative Office
Budget Activity Records	10 Years	Fiscal	SCACAP
Budget Records (Annual)	Permanent	Fiscal	SCACAP Early Head Start Office/ Region IV Office
Budget Reports	5 Years	Fiscal	SCACAP EHS-CCP
Building (Floor Plans, Specs)	Permanent	Fiscal	SCACAP EHS-CCP

Building Records (Contracts)	10 Years	Fiscal	SCACAP EHS-CCP
Building Records (Other)	6 Years	Fiscal	SCACAP EHS-CCP
Building Space/Valuation	10Years	Fiscal	SCACAP EHS-CCP
Child Abuse and Neglect	Permanent	Health	SCACAP EHS-CCP
Contracts, Including PSAs	6 Years	Fiscal	SCACAP EHS-CCP
Equipment Inventory Record	4 Years	Fiscal	SCACAP EHS-CCP
Equipment Maintenance	1 Year	Fiscal	SCACAP EHS-CCP
Federal Property Records	6 Years	Fiscal	SCACAP EHS-CCP /Region IV
Financial Records (Closing)	6 years	Fiscal	Destroy
Financial Records (Inc. NFS)	6 years	Fiscal	SCACAP EHS-CCP Office
Grant & Contract Accounting Records (Inc. Direct Payment & Indirect Cost)	5 Years	Fiscal	SCACAP EHS-CCP
Grant Proposals (Funded)	Permanent	EHS Pro ram	SCACAP /Region IV Head Start Office
Grant Proposals (Unfunded)	18 Months	EHS Program	SCACAP EHS- Office CCP
Grievance Records	3 years	SCACAP Human Resources	SCACAP EHS-CCP Office
Health Records from Provider	3 years (in Child File)	Child Care Partners	SCACAP EHS- Office CCP
IFSP/Disability Records	Permanent	Child Care Partners	SCACAP Office
Insurance Claims, SAIF Claims	6 Years		Administrative Office; Destroy
Leases	4 Years		SCACAP EHS-CCP Office/Destroy
Mental Health Observations	3 years		SCACAP EHS-CCP Office; Destroy
Payroll Records Inc. OPE/PAR	6 Years		Payroll Office
Personnel Records	75 Years		Office of Human Resources; Destroy
Personnel Records (Supervisor)	5 Years		SCACAP EHS-CCP Office; Destroy
Real Property Records	6 Years		Administrative Office/
Search Records	3 Years		Office of Human Resources; Destroy
Student Education Records; Complete Child File	3 years		SCACAP EHS-CCP Office; Destroy all but Permanent Student Record
Student Records (Permanent)	Permanent		SCACAP EHS-CCP
Subpoenas	Permanent		Add to Permanent Student Record
Supervision/Monitoring	1 year		SCACAP EHS- Destroy CCP
Tracking/Reporting	1 year		SCACAP EHS-CCP Office; Destroy
USDA/CACFP Records	4 Years		Child care center Office; Destroy

3.0	<u>Human Resources Table of Contents</u>
3.1	Employee Grievance
3.2	Overtime
3.3	Progressive Discipline
3.4	Reduction in Force
3.5	Employee Performance Management System (EPMS)
3.6	Telecommuting
3.7	Sexual and Other Discriminatory Harassment
3.8	Family Medical Leave Act (FMLA)
3.9	Alcohol and Drug Use
3.10	Family Privacy Protection Act
3.11	Fraud, Waste and Abuse
3.12	Nondiscrimination
3.13	Workplace Violence
3.14	Employee Work Schedule
3.15	Recruitment and Selection of Employees

Procedure Title:	Grievance Procedure		
Procedure Number:	3.1	Effective Date:	October 1, 2018
Policy Title Reference	3.1 - Grievance Procedure		
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

The Employee Grievance Procedure Act provides that South Carolina Association of Community Action Partnerships shall establish an employee grievance procedure for covered employees, which shall be reduced to writing and be approved by the State Human Resources Director. A copy of the approved grievance procedure must be made available to covered employees of the agency. Employees choosing to file a grievance or appeal must not be disciplined or otherwise prejudiced for exercising rights or testifying under the provisions of this policy.

As provided for in the Act, grievances or appeals shall include terminations, suspensions, involuntary reassignments in excess of thirty (30) miles from the prior workstation, and demotions. Reclassifications, reassignments, and transfers within the same state salary range are not considered grievances or appeals. However, reclassifications are considered a grievance only if an agency, or an appeal if the SCACAP Executive Director, determines that there is a material issue of fact that the action is a punitive reclassification. Promotions are not adverse employment actions which may be considered grievances or appeals except in instances where the agency, or in the case of appeals, the SCACAP Human Resources Director, determines that there is a material issue of fact as to whether or not an agency has considered a qualified covered employee for a position for which the employee formally applied or would have applied if the employee had known of the promotional opportunity. However, when an agency promotes an employee one organizational level above the promoted employee's former level, that action is not a grievance or appeal for any other qualified covered employee. Failure to be selected for a promotion is not considered an adverse employment action, which can be considered a grievance or an appeal.

A salary decrease based on performance as the result of a Professional Development Plan evaluation, is an adverse employment action that may be considered as a grievance or an appeal. A reduction in force is also an adverse employment action considered as a grievance only if the agency, or as an appeal if the Human Resources Director, determines that there is a material issue of fact that the agency inconsistently or improperly applied its reduction in force policy or plan.

Prior to filing a formal grievance, the covered employee may first attempt to resolve the matter informally with his immediate supervisor. This matter may be presented verbally or in writing. However, this is merely an informal attempt to resolve the matter and cannot be substituted for the requirements of this policy.

REFERENCED PROCEDURES

Step one

If the matter was not resolved informally with the covered employee's immediate supervisor, the covered employee must notify the agency's Human Resources Office in writing to initiate a formal grievance. The covered employee must initiate the grievance with the agency's Human Resources Office within fourteen (14) calendar days of the effective date of the action.

The agency's Human Resources Director or other designated official shall initially review the grievance to determine whether the matter involves a grievance as defined by the Act. The agency's Human Resources Director or other designated official may conduct appropriate investigations and fact-findings as considered necessary to make this determination. If it is determined that the matter is not considered a grievance, the covered employee shall be so advised in writing by the SCACAP Executive Director or a designee, normally within five (5) calendar days of receipt of the grievance. Such determination shall be a final decision within the agency, which may be appealed to the SCACAP Human Resources Director.

If it is determined that the matter is not considered a grievance, the agency's Human Resources Director or other designated official will promptly schedule a mediation conference to occur between the covered employee's next level supervisor and the covered employee, normally within five (5) calendar days of receipt of the grievance. However, any initial determination by the agency's Human Resources Director or other designated official that the matter may be grieved shall only entitle the covered employee to have the matter considered in accordance with this grievance procedure and shall in no way be construed to be an adjudication of the merits of the grievance. At the conference with the covered employee's next level supervisor, the covered employee will have an opportunity to present his position regarding the grievance. The next level supervisor may conduct appropriate investigations and fact-findings to determine whether to accept, reject, or modify the disciplinary action taken against the covered employee. The covered employee shall be advised of his next level supervisor's decision in writing within five (5) calendar days of the conference.

Step two

To continue the grievance, the covered employee must notify the SCACAP Executive Director or a designee in writing within five (5) calendar days after receiving the Step One decision. The SCACAP Executive Director or a designee must promptly schedule and conduct a conference with the covered employee, normally within five (5) calendar days. The covered employee will be provided an opportunity at this time to present his position regarding the grievance. The SCACAP Executive Director or a designee may conduct appropriate investigations and fact-findings to determine whether to accept, reject, or modify the disciplinary action taken against the covered employee. The SCACAP Executive Director or a designee shall advise the covered employee of the decision in writing within five (5) calendar days of the conference. This decision will be final within the agency.

Appeals to the SCACAP Human Resource Director

The Act provides for an appeal of a grievance beyond the SCACAP Human Resources Director. Any covered employee may appeal the decision of the SCACAP Executive Director or a designee. Such appeal must be in writing and must be submitted to the SCACAP Human Resources Director within ten (10) calendar days of receipt of the agency's final decision or 55 calendar days from the initial date the grievance was filed within the agency, whichever occurs later. As to the 55 calendar days, the Act provides that a covered employee may appeal directly to the SCACAP Human Resources Director in the event the agency does not complete its entire internal grievance procedure within 45 calendar days from the time the grievance is initially filed within the agency. Failure by the agency to issue a final decision within this 45-calendar day period is considered an adverse decision. The failure to issue a final decision allows the covered employee to proceed with an appeal to the SCACAP Human Resources Director after 45-calendar days, but no later than 55-calendar days from the initial date the grievance was filed within the agency. Failure by the covered employee to file an appeal within the time periods referenced in this paragraph shall constitute a waiver of the right to appeal.

Failure by the covered employee to comply with the internal times in the agency grievance procedure constitutes a failure to exhaust administrative remedies and waives the covered employee's right to further continue the grievance. The internal time periods of the agency grievance procedure, however, may be waived upon the mutual written agreement of both parties. The 45-calendar day period for action by the agency may not be waived except by mutual written agreement of both parties.

The Act allows the covered employees to appeal to the SCACAP Human Resources Director any grievance involving the issues specified in the Act after all administrative remedies to secure relief within the agency have been exhausted. The Act also provides that a covered employee has the right during the grievance and appeal process to a representative, which may include legal counsel. If the covered employee chooses to exercise the right of legal counsel, it shall be at his expense.

Procedure Title:	Overtime		
Procedure Number	3.2	I Effective Date:	I October 1, 2018
Policy Title Reference:	3.2 – Overtime		
Regulation References;			
Forms:	III	III	
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates;			

POLICY

The use of overtime should be an exception to the regular work schedule in any unit. An employee should only be required to work overtime on an occasional basis to meet a sudden increase in the workload, to overcome productive time lost due to some mechanical failure, or to meet the demands of a crisis.

Appropriate management should review when any unit and/or individual is found to be consistently charging overtime, the functions of that unit and/or individual. Every attempt should be made to avoid the repetitive and chronic use of overtime.

It shall be the responsibility of each manager to determine that the provisions of this policy are administered in the best interest of the Agency. Although each manager is responsible for the requesting of overtime, it is equally important to control unauthorized overtime. Unauthorized work shall be counted as hours worked if the responsible manager could have stopped it but did not, or if he/she knows or has reason to know of this practice.

PROCEDURE:

EXEMPT/NONEXEMPT STATUS UNDER THE FAIR LABOR STANDARDS ACT

Exemptions from both the minimum wage and overtime pay requirements of the Fair Labor Standards Act for any employee in a bona fide executive, administrative, or professional position, shall be determined by the SCACAP Executive Director or his/her designee. All other employees shall be non-exempt. Each section shall be advised of those determinations, which apply to its employees.

MINIMUM WAGE

All non-exempt employees must be paid not less than the current minimum wage.

COMPENSATION

Compensation of all employees is based on thirty-seven and a half (37.5) hours per week.

THE WORKWEEK

The normal workweek for the South Carolina Association of Community Action Partnerships shall be 37.5 hours. However, employees shall not receive additional compensation for hours worked excessive 37.5.

HOURS WORKED

Hours worked include all time that the employee is required to be on duty or at the prescribed workplace and all time during which the employee is permitted to work. This includes any bona fide work, which the employee performs on or away from the premises if the supervisor knows or has reason to believe that the work is being performed.

REGULAR RATE

The regular rate of pay includes all remuneration for employment paid to an employee to include base pay,

longevities, and shift differentials.

HOURLY RATE EMPLOYEES

The hourly rate is the "regular rate" for hourly employees. This rate is calculated by dividing the annual salary by 2080 hours. Hourly employees shall be compensated for all hours worked. Because only salaried employees can be exempt, all employees compensated on hourly rate basis must be classified as non-exempt.

HOLIDAYS

A non-exempt employee who is required to work on a legal holiday shall be given compensatory holiday leave credits in accordance with SCACAP Human Resources Regulations; however, time worked on a legal holiday shall be used in computing total hours worked.

SUPERVISORY APPROVAL REQUIREMENT

All overtime (work time in excess of 37.5 hours per-week for non-exempt staff) must be approved in advance and in writing by the employee's direct supervisor. The accrual of unapproved compensatory time is prohibited and subject to the Progressive Discipline policy.

COMPENSATORY TIME

As a SCACAP employee, overtime shall accrue in the form of compensatory time for non-exempt employees. Compensatory time can be accumulated up to 240 hours. Any compensatory time earned over 240 hours must be paid to the employee in the next paycheck. Managers are encouraged to provide compensatory time back to employees as soon as possible, preferably within 90 days.

OVERTIME/COMPENSATORY TIME MAY NOT BE WAIVED (OFF THE RECORD ADJUSTMENTS)

The requirements that overtime pay must be paid or compensatory time granted to nonexempt employees after 37.5 hours of work in a workweek shall not be waived by agreement between the supervisor and the employee.

ADJUSTED WORKWEEK

Under warranted circumstances, a non-exempt employee may be allowed to work in excess of the normal workday and may be given time off during the same workweek at the rate of an hour for an hour to avoid working over 37.5 hours in a workweek. This adjustment is not allowed for hours worked between 37.5 and 40.0 hours during any workweek. This type of work rescheduling precludes working over 40.0 hours in a workweek and eliminates the need for compensatory time or overtime payment.

EXEMPT EMPLOYEES

Exempt employees may receive compensatory time off for hours worked, for time spent traveling, or for attendance at Job-related lectures, meetings, training programs, etc., in excess of the normal workweek (40 hours per week). [NOTE: If

granted, it must not be at a rate greater than one (1) hour of compensatory time for each hour worked in excess of 37.5 in the official workweek and may be at a lesser rate. Exempt employees must not be paid for overtime.]

HOLIDAY/EXEMPT EMPLOYEES

An exempt employee who is required to work on a legal holiday shall be given compensatory leave credits in accordance with Human Resources Regulations.

ON-CALL STATUS

If an employee who is on-call is not confined to his or her home or any particular place but is required only to leave work where he or she can be reached, the hours spent on-call are not regarded as working hours.

MEAL PERIODS

A bona fide meal period of thirty (30) minutes or more which occurs during the scheduled workday is not hours worked if the employee is completely relieved from duty for the purpose of eating a meal. The meal period (lunch period) for SCACAP is one (1) hour each workday.

REST PERIODS

Rest periods or "coffee breaks" of short durations must be counted as hours worked. One morning and one afternoon "coffee break" of no more than fifteen (15) minutes each is permitted. Breaks shall not be used to allow an employee to come in late, to leave early, or to extend the lunch period, without permission from the employee's supervisor. All rest periods or "coffee breaks" must be authorized by the employee's direct supervisor.

LEAVE STATUS

Time spent in leave status is not considered hours worked.

TRAVEL TIME (NON-EXEMPT)

Travel time for nonexempt employees may be hours worked under some conditions. Ordinary home-to-work travel or vice versa is not working time. All time spent traveling on one-day assignments is considered time worked regardless of time of day or day of the week.

Travel away from home involving an overnight stay for nonexempt employees is considered time worked when it occurs during the employee's normal working hours. This provision is applicable not only on regular working days, but also during the corresponding hours of non-working days.

LECTURES, MEETINGS, AND TRAINING EMPLOYEES (NONEXEMPT)

When a nonexempt employee by reason of official responsibilities is required to attend lectures, meetings, training programs, etc., such time shall be considered work time.

Procedure Title:	Progressive Discipline		
Procedure Number	3.3	Effective Date:	November 4, 2018
Policy Title Reference:	3.3 - Progressive Discipline		
Regulation References,	45CFR1302.90(2)		
Forms:	III I		
SCACAP Executive Director Approval Date:	November 4, 2018	EHS Director Approval Date:	November 4, 2018
Revisions Dates:			

POLICY

SECTION A: GENERAL

A review of the progressive discipline procedures should be maintained to ensure that all supervisors are being consistent in taking disciplinary action against employees involved in similar situations and that employees are aware of the disciplinary actions. Consequently, each supervisor and employee will be given a copy of the policy. This progressive discipline policy does not apply to probationary employees who may be disciplined at the agency's discretion.

SECTION B: GUIDELINES

The circumstances surrounding an offense, such as the severity of the misconduct, the number of times it has occurred and any previous counseling, will suggest what action should be taken. Usually, counseling or an oral reprimand is sufficient for the first occurrence of a minor offense. A record of this action with the employee's and the supervisor's signatures should be placed in the employee's personnel file. A repetition of the offense or the first occurrence of a more severe offense should be followed by a written reprimand, which becomes a part of the employee's permanent personnel file (which should also be signed by the employee as having been received and understood). Further repetitions of the offense or the first occurrence of a very serious offense is followed by suspension, reassignment, demotion, termination or other appropriate action. Please note that these are intended only to be guidelines because it is most difficult to be all-inclusive or to assign a degree of severity to the various examples given below. For example, "leaving the work station without authorization" may range from a temporary absence from the work station to complete abandonment of a position. In such case, a manager must rely on judgment as an administrator to arrive at appropriate disciplinary action. At management's discretion, individual offenses calling for oral or written reprimands could cumulatively result in suspension or termination.

PROCEDURE

DISCIPLINARY ACTIONS

No disciplinary actions beyond a written reprimand may be taken without being authorized by the SCACAP EHS-CCP Director or a designee. Division Directors, Unit Managers, or Supervisors may recommend appropriate discipline. The following steps shall be followed in such cases when discipline beyond the written reprimand is necessary.

1. The supervisor presents all facts surrounding the incident to the Unit Manager, or in the cases where the Unit Manager is initiating the action, he/she presents the facts to the EHS-CCP Director with a recommendation for discipline.
2. If the EHS-CCP Director agrees with the recommendation, the matter is next discussed with the Human Resources Officer and the Executive Director or a designee.
3. If action is to be taken, it shall be taken under the authority and signature of the Ag Director or a designee with the supervisor initiating such action.

OFFENSE	RANGE OF DISCIPLINARY ACTIONS
Unauthorized Leave	Written Reprimand to Termination
Habitual Tardiness or Failure to Observe Assigned Work Hours	Oral Reprimand to Termination
Abuse of Leave (Refer to Family and Medical Leave Act and Americans with Disabilities Act)	Oral Reprimand to Termination
Excessive Absenteeism	(To be used for employee, who become unreliable because of frequent absenteeism, even if it is for good and sufficient reason. Termination should be preceded by oral counseling in an attempt to inform the employee of the problem. Refer to Family and Medical Leave Act and Americans with Disabilities Act.)
Leaving Work station without Authorization	Suspension to Termination
Drinking Alcoholic Beverages on the Job	Termination
Reporting to work under the influence, Possessing, or Using Illegal Drugs on the Job	Termination
Insubordination	Oral Reprimand to Termination
Falsification of records or Documents	Suspension to Termination
Stealing	Termination
Negligence	Oral Reprimand to Termination
Willful Violation of Written Rules, Regulation or Written Policies	Suspension to Termination
Unauthorized Use of SCACAP Equipment or Property	Oral Reprimand to Termination
Destruction or Misuse of Property or Equipment	Written Reprimand to Termination
Unauthorized Solicitation or Sales on SCACAP Premises	Oral Reprimand to Termination
Unauthorized Possession of Firearms on the Job	Termination
Unauthorized Distribution of Written/Printed Material of Any Kind	Written Reprimand to Termination
Sleeping While on Duty	Written Reprimand to Termination
Horseplay	Oral Reprimand to Termination

Malicious Use of Profane/Abusive Language to Others	Oral Reprimand to Termination
Loafing	Oral Reprimand to Termination
Interference with Other Employee's Work	Oral Reprimand to Termination
Working on Personal Jobs during Work Hours	Oral Reprimand to Termination
Excessive Use of Telephone for Personal Matters	Oral Reprimand to Termination
Defacing SCACAP Property	Written Reprimand to Termination
Sexual Harassment (Refer to Sexual Harassment Policy)	Written Reprimand to Termination
Conviction of up to a felony	Termination
Conviction of a misdemeanor, which adversely reflects on an individual's suitability for, continued employment	Termination
Discourteous treatment of visitors and/or customers	Oral Reprimand to Termination
Failure to maintain satisfactory or harmonious working relationships with employees or supervisors	Oral Reprimand to Termination
Improper conduct or conduct unbecoming a state employee	Written Reprimand to Termination
Willful false statements to a supervisor	Suspension to Termination
Workplace Violence (Refer to Workplace Violence Policy)	Written Reprimand to Termination

The above indicated range of disciplinary actions or disciplinary action in response to specific offenses are to be used as a guide and are not intended to be all-inclusive. At the occurrence of any of the listed offenses or any that are not listed, the appropriate discipline shall be determined after the particular circumstances of the case have been carefully considered. The state and federal laws referenced above are not all-inclusive in administering discipline.

EMPLOYEE COMMENTS

The employee may attach additional comments to any disciplinary action, if desired, within a preset amount of time.

WORKPLACE VIOLENCE

Workplace Domestic Violence Policy requires every agency to develop and implement an agency workplace domestic violence policy and adopt a "zero tolerance" approach to the act or threat of violence of any kind. If employees engage in any violence in the workplace, or threaten violence in the workplace, their employment will be terminated immediately for cause. The "zero tolerance" approach must be applied to all forms of workplace violence. These include, but are not limited to:

- Physical-the use of force in order to harm;
- Threats-expressions of intent to inflict injury;
- Harassment-words, gestures, and actions which tend to annoy, alarm, or abuse another person;
- Property damage-intentional damage to property owned by the state, employees, visitors, or vendors; and
- Domestic-physical harm or injury or an offer or attempt to cause physical harm or injury by a household member.

Procedure Title:	Reduction in Force		
Procedure Number:	3.4	Effective Date:	October 1, 2018
Policy Title Reference:	3.4 - Reduction in Force		
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates.			

POLICY

The purpose of this policy is to prescribe the manner in which covered employees in The South Carolina Association of Community Action Partnerships to School Readiness (SCACAP) government are released in an equitable manner should a reduction in force become necessary. A reduction in force may require the separation, involuntary demotion, reassignment, or reduction in work hours of the Agency has covered employees. A reduction in force does not apply to non-covered employees (e.g., probationary employees, temporary employees, temporary grant employees, time-limited project employees, research grant employees, and employees exempt from the State Employee Grievance Procedure Act).

The South Carolina Association of Community Action Partnerships to School Readiness (SCACAP) may implement a reduction in force for one or more of the following four reasons:

- A. Reorganization;
- B. Work Shortage;
- C. Loss of Funding; or
- D. Outsourcing/Privatization.

REFERENCED PROCEDURES

MANAGEMENT DECISIONS

SCACAP shall determine the following items prior to developing the reduction in force plan:

- A. What is the reason(s) for the reduction in force?
- B. What areas(s) of the agency are to be impacted by the reduction in force?
[e.g., Competitive Area(s)];
- C. What State class title(s) within the competitive area(s) are to be affected?
[e.g., Competitive Group(s)]; and
- D. How many positions in each State class title(s) are to be eliminated?

COMPETITIVE AREA(S)

The South Carolina Association of Community Action Partnerships to School Readiness (SCACAP) shall determine the competitive area(s) the reduction in force will affect. The Executive Director should establish a competitive area that is clearly distinguishable from the staff in other areas and where the interchange of employees

would not be practical. This competitive area may be the entire agency, a department or division, a unit, or a geographical location.

COMPETITIVE GROUP(S)

The Agency shall determine the competitive group(s) based on the wage compatibility study(s) within the competitive area(s) that the reduction in force will affect. If the reduction in force is to apply to more than one position title, each position title will be treated separately, except where the reductions are to be made in a position series (e.g., Auditor I, Auditor II, Auditor III, Auditor IV, Audits Manager I, Audits Manager II) or in State class titles that are part of the Agency's customary career path (e.g. Administrative Assistant, Communications Coordinator, Program Coordinator II, Program Manager I).

RETENTION POINTS

SCACAP shall calculate retention points for covered employees in the competitive area(s) and competitive group(s) to be used in determining which covered employees are to be involuntarily demoted, reassigned, have reduced hours or separated. Retention points shall be based on the total scores of the two most recent annual performance appraisals and the length of continuous State service. The sum of the retention points for performance and length of continuous State service are the total retention points that an employee uses in the competition.

PERFORMANCE EVALUATION POINTS

SCACAP will determine the total score for an annual performance rating by using the following numerical values assigned to the **Head Start Performance Standards** performance ratings.

- Exceeds Performance Requirements = 2
- Meets Performance Requirements =1
- Below Performance Requirements= 0

SCACAP will recognize the performance ratings as follows for current state employees transferring to this agency for reviews: "Substantially Exceeds Requirements" and "Exceed Requirements" as "Exceptional," "Meets Performance Requirements" as "Successful," and "Below Performance Requirements" as "Unsuccessful."

For any year in which the employee does not receive an actual evaluation with a rating, the employee will receive a Successful rating for that year; however, if in the previous year, the employee received a higher than Successful rating the employee will receive the points for the higher rating.

CONTINUOUS STATE SERVICE POINTS

Covered employees will receive one retention point for each year of continuous EHS service after completion of a 12-month probationary period. Six months or more of continuous State service will be considered as one year of service and less than six months of service will receive no retention points.

EXCEPTION TO PROCEDURE FOR RETENTION POINT CALCULATION

If every position in the competitive area is being eliminated, the agency is not required to calculate retention points. For positions reestablished within one year, in the same competitive area and in the same class title, SCACAP must calculate retention points at the time of recall. The agency must calculate retention points using continuous state service and performance evaluation points based on the effective date of the reduction in force.

SEQUENCE OF REDUCTION IN FORCE

The order of the reduction in force of covered employees in each position title(s) shall be determined by the total number of retention points for each employee. If two or more employees affected by a reduction in force have the same number of retention points and not all are to be affected by the reduction in force, the SCACAP hire date will determine the order of the employees affected. The covered employee with the earlier SCACAP hire date will be retained. If after using the employee's agency hire date to determine the order of affected employees a tie still exists, the SCACAP Executive Director will place the names of those employees with whom the tie exists in a hat. The name(s) drawn from the hat will be retained.

Bumping rights are provided for covered employees who have accumulated more retention points than those with whom they are competing. Under no circumstances can an employee gain from a reduction in force. Bumping rights are provided only downward.

RETENTION OF NECESSARY QUALIFICATIONS

No employee with a lower number of retention points shall be retained in preference to another employee in a competitive area(s) and group(s) with a higher number of retention points except when the SCACAP Executive Director determines that a Retention of Necessary Qualifications applies. If an employee is competing for a position that is not being eliminated and the SCACAP asserts that an employee with higher retention points who has rights to be placed in that position cannot satisfactorily perform the duties of the position within a reasonable training period, the employee with lower retention points may be retained in preference to the employee with higher retention points. The SCACAP may determine that the employee with higher retention points will not be able within a reasonable training period to satisfactorily perform the duties of the job based on the lack of knowledge, abilities, skills, supervisory responsibilities, or necessary experience.

When a Retention of Necessary Qualifications is used in a reduction in force plan, justification for this retention must be documented and approved by the SCACAP Executive Director prior to submitting the reduction in force plan to the Human Resources for review and approval for procedural correctness. The Agency should retain documentation to support any retentions made on this basis.

THE REDUCTION IN FORCE PLAN

Once SCACAP has made the decisions outlined above and prior to the implementation of a reduction in force, the SCACAP Executive Director or his/her designee shall develop the reduction in force plan.

This plan must include the following:

1. The reason for the reduction in force;
2. The identification of the competitive area(s);
3. The identification of the competitive group(s) [position title(s)];
4. The number of position(s) to be eliminated in each State class title;
5. A list of the covered employees, in order of retention points, in the competitive area(s) and competitive group(s) to include the following:
 - a. Name;
 - b. Age, Race, and Gender; and
 - c. Retention Points;
6. Justification of any Retention of Necessary Qualifications used in the reduction in force plan; and
7. SCACAP efforts to assist employees affected by the reduction in force.

APPROVAL PROCESS

Once the reduction in force plan has been completed, the Executive Director shall submit the following information to Human Resources for review and approval for procedural correctness:

The reduction in force plan as outlined in the previous section:

- A. An organizational chart including each position (designated with the State class title and incumbent's name) within the competitive area(s);
- B. A copy of the Agency's reduction in force policy; and
- C. A sample letter to employees affected by the reduction in force including information as outlined in Section XI, along with:
 - A list of the employee's recall and reinstatement rights;
 - The Agency's procedure for the recall of an employee; and
 - The employee's grievance rights.

IMPLEMENTATION OF THE REDUCTION IN FORCE

SCACAP shall communicate in writing the following information to each affected employee after the State Office of Human Resources approves the reduction in force plan for procedural correctness and before the reduction in force becomes effective:

1. The reason for the reduction in force;
2. The competitive area(s) and competitive group(s) in which the employee competed;
3. The benefits to which the employee is entitled and the manner in which the reduction in force will affect the employee's State benefits (e.g., health insurance, optional life insurance, retirement);
4. The employee's reinstatement rights (e.g., reinstatement of all sick leave; option of buying back all, some, or none of the annual leave at the rate at which it was paid out);
5. The employee's recall rights to any position, within the competitive area, that becomes available in the same position class the employee held prior to the reduction in force;
6. The manner in which the Agency will notify the employee of any such vacancies; and
7. The requirements of S.C. Code of Laws Ann. Section 8-11-185, which requires the Agency to report information about the employees separated in a reduction in force to the Division of Human Resources.

RECALL AND REINSTATEMENT RIGHTS

An employee affected by a reduction in force has recall and reinstatement rights to a position in SCACAP for one year after the effective date of the reduction in force.

1. Recall Rights

If a vacancy occurs within the competitive area which is in the same State class title as the position the employee held prior to the reduction in force, the SCACAP will recall employees in the inverse order of the reduction in force. SCACAP will notify the employee in writing of the job offer and recall rights. If the employee does not accept the job offer within ten days, the employee's recall rights are waived. Should the employee accept the job offer, the SCACAP will reinstate the employee's accumulated sick leave, and will provide the employee the option of buying back all, some, or none of his annual leave at the rate it was paid out at the time of the separation. Upon returning to employment in an insurance-eligible FTE position, the employee will also be offered insurance benefits as a new hire. The recalled employee may purchase retirement service credit under the leave of absence provision in Section 9-1-1140(D) for the period of time that the employee was not employed by state government, at the cost specified in Section 9-1-1140(D). When an employee is recalled, this time will not be considered punitive in the determination of retiree insurance eligibility.

2. Reinstatement Rights

An employee separated by a reduction in force may apply for any SCACAP job for which he meets the minimum training and experience requirements. Should the separated employee accept a job offer to an FTE position, SCACAP will reinstate the employee's accumulated sick leave, and will provide the employee the option of buying back all, some, or none of his annual leave at the rate it was paid out at the time of the separation. Upon returning to employment in an insurance eligible

Full-Time Equivalent (FTE) position, the employee will also be offered insurance benefits as a new hire. The reinstated employee may purchase retirement service credit under the leave of absence provision in Section 9-1-1140(0) for the period of time that the employee was not employed by state government, at the cost specified in Section 9-1-1140(D). When an employee is reinstated, this time will not be considered punitive in the determination of retiree insurance eligibility. If the employee is reinstated to another position, he still retains his recall rights to a position in the same class in the competitive area, should a position become available.

GRIEVANCE RIGHTS

A covered employee who is affected by a reduction in force has the right to file a grievance to SCACAP and an appeal to the Human Resources Officer only if the grievance or appeal is based on improper or inconsistent application of a reduction in force policy or plan.

Procedure Title:	EPMS - Employee Performance Management System		
Procedure Number	3.5	Effective Date:	October 1, 2018
Policy Title Reference:	3.5 - EPMS Employee Performance Management System		
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

The South Carolina Association of Community Action Partnerships to School Readiness (SCACAP) will establish an Employee Performance Management System and policy in accordance with the rules and regulations of the South Carolina Department of Administration and existing SCACAP policies and procedures.

This document sets forth the SCACAP policies and procedures for establishing and administering the employee performance system. Each employee's performance will be evaluated using this policy at a minimum of once a year. This will include all employees, full time, part time, or contractual.

DEFINITIONS

Established Review Date - The employee's review date is established in accordance with State Human Resources Regulations.

Universal Review Date - The date prior to which all employee's performance reviews are due. November 2 will be the universal review date for the agency. (Exceptions: "probationary" employees and "trial" employees.)

Short Year Review - Any performance appraisal that evaluates an employee's performance for a period of time less than twelve (12) months. (Exceptions: "trial" period reviews and "warning notice" reviews.)

Short Year Planning Stage - Any EPMS planning stage document covering a period of time less than twelve (12) months. (Exception: "trial" period planning stages.)

PROCEDURES

GENERAL INFORMATION

All performance reviews shall be made in writing by the employee's supervisor (the rater) who has direct experience or knowledge of the work being performed. The performance review shall be reviewed by the next higher-level supervisor (the reviewer), unless the rater is the agency head, prior to the appraisal being discussed with the employee. The reviewer may attach additional comments to the appraisal, and in the attachment may take exception to any of the rater's appraisal points. The reviewer, however, does not have the authority to change the appraisal completed by the rater. Whenever an employee's job responsibilities change significantly, the appraisal document should be revised to reflect that change. The final appraisal must bear the signature of the rater, the reviewer and the employee, if possible. If any party refuses to sign the appraisal, a notation shall be made on the performance appraisal of this. If possible, a witness should sign to acknowledge that the party refused to sign the appraisal.

All performance reviews shall become a permanent part of the employee's official personnel file. Upon request, SCACAP shall furnish the employee with a copy of the performance review with copies of all pertinent attachments including the form completed at the time of the planning stage and the final review form.

The provisions of this policy shall address the review process of both probationary and covered employees. Although not mentioned specifically in this policy, employees exempt from coverage under the State Employee Grievance Procedure Act shall also be given annual performance appraisals.

TRAINING

Training is required for all employees within the SCACAP in regard to EPMS and shall be provided for all new employees.

IMPLEMENTATION

The agency will phase in the Universal Review Date. As of the effective date of this policy, once an employee reaches his/her Established Review Date the employee will receive a Short Year Planning Stage and Short Year Review in order to move the employee from the Established Review Date to the Universal Review Date.

LEVELS OF PERFORMANCE

There shall be three levels of performance to rate each job function and objective and to rate overall performance:

1. Exceptional
Work that is above the criteria of the job function throughout the rating period.
2. Successful
Work that meets the criteria of the job function.
3. Unsuccessful
Work that fails to meet the criteria of the job function.

Performance characteristics shall not be rated by the three levels of performance, but shall be given a rating of pass or fail.

1. Pass
Meets requirements.
2. Fail
Fails to meet requirements.

PLANNING STAGE

Each employee shall have a planning stage conducted at the beginning of each rating period. The employee's job functions (which include job duties and success criteria), objectives, and performance characteristics for the next rating period will be discussed at this time. The rater and employee should participate in drafting the planning stage document. The reviewing officer and the rater should discuss the requirements for the coming year prior to the planning stage. A rater may incorporate a team activity into the planning stage document. The team performance being evaluated could constitute a job function, an objective, or one criteria for a particular job function or objective. A professional development plan for the employee can be linked to the planning stage document.

JOB FUNCTIONS

The rater and the employee shall determine the job functions (which include job duties and success criteria) by reviewing the employee's position description. If the position description is not up-to-date, or if there is no position description, one should be prepared and submitted to SCACAP Human Resource Director for approval. In those instances, where the rater and employee cannot agree upon the job functions, the rater's decision shall be final. The statement outlining the job functions should include descriptive information about the performance expectations (success criteria) of the rater. The descriptive statement should specify the expectations of the rater for the employee to meet performance requirements. Each job function shall be rated in the evaluation stage based on the three levels of performance. It shall be mandatory for all raters to be evaluated on the timely completion of each employee's performance appraisal.

OBJECTIVES

An objective should be included when the employee is assigned a special, non-recurring project or assignment that is not included on the employee's position description. The statement outlining the objective(s) should also include descriptive information about the performance expectations (success criteria) of the rater. The descriptive statement should specify the expectations of the rater in order for the employee to meet performance requirements. Each objective shall be rated in the evaluation stage based on the three levels of performance.

PERFORMANCE CHARACTERISTICS

A list of suggested performance characteristics and their definitions will be provided. Each performance characteristic shall be defined in the planning stage and rated as "pass" or "fail" in the evaluation stage. The performance characteristics section shall be used as a communication tool to emphasize those performance characteristics that are important to success in performing the job functions and objectives included in the employee's planning document. The performance characteristics section shall not be weighted in the determination of the overall performance rating. However, these success criteria per job function may be used to help define expectations that relate to these characteristics.

It shall be mandatory for all managers and supervisors to be rated on the performance characteristic of "promoting equal opportunity." Promoting equal opportunity includes such areas as hiring, promotion, or placement, or special projects assignments; level of personal and organizational commitment to equal opportunity; progress toward achieving a fully integrated and representative work force.

ONGOING PERFORMANCE MANAGEMENT

A rater should continue to provide performance feedback to employees throughout the review period. An unofficial mid-year review is encouraged, though not required, to facilitate this communication between raters and employees. In addition, various options are available to the rater in conducting performance reviews and in providing ongoing performance feedback. It is an expectation that raters will gather feedback using an approved tool from any appropriate internal and external source to prepare the review document. The supervisor must include the use of any confidential or non-confidential input provided in an appropriate manner. Any supervisor may conduct unofficial reviews more frequently than required in this policy.

PROBATIONARY PERIODS

Each new employee in probationary status shall be rated prior to the completion of a 180-day probationary period. The performance review date marks the beginning of a new review period. If that employee does not receive a performance review prior to the performance review date, the employee will receive a "successful" rating by default and obtain covered status as a SCACAP employee and permanent status in the position class. The probationary period may not be extended. After satisfactory completion of the probationary period, an employee may receive a short year planning stage and review in order to move the employee to the universal review date. If an employee is not performing satisfactorily during the probationary period, the employee shall be terminated before becoming a covered employee. Until an employee has completed the probationary period and has a "successful" or higher overall rating on the employee's evaluation, the employee has no grievance rights under the State Employee Grievance Procedure Act; therefore, an agency is not required to follow the "Substandard Performance Process" to terminate a probationary employee. The "successful" rating is the equivalent to the "meets" performance rating referenced in the State Employee Grievance Procedure Act.

ANNUAL PERFORMANCE REVIEWS

All employees shall be given an annual review no more than 90 calendar days prior to the employee's performance review date. An employee on approved leave with or without pay for more than 30 consecutive workdays may have the performance review date advanced up to 90 days after those first 30 workdays. A covered employee who within 30 calendar days of his performance review date receives a "Warning Notice of Substandard Performance" shall have the performance review date advanced up to 90 days.

The performance review date marks the beginning of a new review period. If an employee does not receive an appraisal prior to the performance review date, the employee shall receive a "successful" rating by default. A covered employee may not be issued an overall "unsuccessful" appraisal at any time during the annual review period without following the

"Substandard Performance Process." Should the review date advance, the employee may require a short year planning stage and a short year review period in order to move the employee back to the universal review date.

TRIAL PERIODS

Each covered employee who has been demoted, promoted or reclassified shall be appraised prior to the completion of a six-month trial period in the position. The performance review date marks the beginning of a new review period. If an employee does not receive a performance appraisal prior to the performance review date, the employee will receive a "successful" rating by default and obtain permanent status in the new classification. Once an employee has completed a successful trial period and obtained permanent status in a class, the employee retains permanent status in the class throughout the employee's continuous service. The six-month trial period may be extended up to 90 calendar days upon written notice to the employee prior to the end of the six-month trial period. The employee's performance review date shall be advanced for the time period such extension is in effect. After satisfactory completion of the trial period, the employee may require a short year planning stage and a short year review in order to move the employee back to the universal review date.

The "Substandard Performance Process" is not required to demote or reclassify downward an employee in trial status to the same class from which promoted, if the demotion or reclassification occurs within the trial period. The "Substandard Performance Process" is also not required to demote or reclassify downward an employee in trial status to a class in an equal or higher pay band from which promoted, if the demotion or reclassification occurs within the trial period. The employee in trial status may not grieve such demotion. The employee in trial status may not be terminated or demoted to a class in a lower pay band than that from which promoted for performance reasons without following the "Substandard Performance Process."

SUBSTANDARD PERFORMANCE PROCESS FOR COVERED EMPLOYEES

A covered employee is entitled to adequate notice of substandard performance and the opportunity to improve the substandard performance before receiving a "unsuccessful" rating and being removed from the position. To ensure this occurs, the following procedures shall be followed:

- a. If during the performance period an employee is considered "unsuccessful/ in any essential job function or objective which significantly impacts performance, the rater shall provide the employee with a written "Warning Notice of Substandard Performance." A rater shall issue a "Warning Notice of Substandard Performance" prior to issuing an "unsuccessful" rating to a covered employee. The warning notice shall provide for an improvement period of no less than 30 days and no more than 120 days. The warning notice may be issued at any time during the review period. Ordinarily, the warning period may not extend beyond the employee's review date. However, if the warning notice is issued less than 30 days from the employee's review date, the performance review date shall be advanced up to 90 days. Should the performance review date be advanced and the employee receives a "successful" or above rating on all essential job functions/objectives, which significantly impact performance, noted in the warning notice, the employee may require a short year planning stage and a short year review in order to move the employee back to the universal review date.
- b. The rater and employee should participate in drafting a work improvement plan during the improvement period. The work improvement plan should include a list of ways to improve the deficiencies and other appropriate performance related recommendations. In those instances, where the rater and employee cannot agree upon the content of the work improvement plan, the rater's decision shall be final.
- c. During the warning period, the employee and the rater shall have regularly scheduled meetings during which they shall discuss the employee's progress. Documentation is required to verify that these counseling sessions were held. Copies of this documentation shall be placed in the employee's official personnel file and given to the employee upon request.
- d. If the employee's performance is rated "successful" or above, on all essential job functions/objectives, which significantly impact performance, noted in the warning notice by the end of the warning period, employment shall continue. If the employee is rated "unsuccessful," on any essential job function or objective which significantly impacts performance as

noted in the warning notice by the end of the warning period, the employee shall be removed from the position immediately (i.e., terminated, reassigned, demoted).

e. Once a time frame for improving substandard performance has been given, the employee must receive a written appraisal prior to the end of the warning period or the employee will receive a "successful" rating by default.

f. If an employee has been issued two warning notices within a 365-day period and performance drops to a substandard level on any essential job function/objective, which significantly impacts performance for a third time within a 365-day period, the employee shall be removed from the position upon the third recurrence of such substandard performance by issuing the "unsuccessful" appraisal. A warning notice is not required on the third occurrence.

WARNING NOTICE OF SUBSTANDARD PERFORMANCE

The requirements of a "Warning Notice of Substandard Performance" are:

- a. The notice shall be in writing, addressed to the employee, labeled as a "Warning Notice of Substandard Performance," and signed by the employee (witnessed, if employee will not sign).
 - b. The notice shall list the job function(s) and/or objective(s) included on the employee's planning document that are considered "below performance requirements," with an explanation of the deficiencies for each job function and/or objective.
 - c. The notice shall include the time period for improvement and the consequences if no improvement is noted (i.e., terminated, demotion, reassignment).
 - d. The notice shall include a plan for meetings to discuss employee progress during the warning period.
- A copy of the notice shall be given to the employee and placed in the employee's official personnel file.

Procedure Title:	Telecommuting		
Procedure Number:	3.6	Effective Date:	October 1, 2018
Policy Title Reference:	3.6 – Telecommuting		
Regulation References:			
Forms:	II		
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

The South Carolina Association of Community Action Partnerships to School Readiness (SCACAP) establishes a "telecommuting" policy in accordance with the rules and regulations of the South Carolina Department of Administration and existing SCACAP policies and procedures.

This document sets forth the SCACAP policies and procedures for establishing and administering telecommuting where it is a viable management work option.

The purpose of this policy is to allow the use of telecommuting where it is a viable management work option and an explanation of the rules under which it will operate. This policy does not attempt to address the special conditions and needs of all employees. SCACAP recognizes that it may be possible to meet the needs both of SCACAP and of the employee by allowing him or her to work away from the regular office setting during all or part of the workweek.

Telecommuting is a management option and not a universal employee benefit. It is the option of SCACAP to allow an employee to telecommute through its telecommuting policy. An employee's participation in the SCACAP telecommuting program is voluntary. Employee participation in telecommuting is managed by the SCACAP Human Resources Coordinator.

DEFINITIONS

Telecommuting-A voluntary work arrangement whereby eligible employees are allowed to perform the normal duties and responsibilities of their positions through the use of computers or other telecommunication equipment, at home or at an alternate workplace apart from the employee's official location of work. Telecommuting may be a part-time or a full-time arrangement. The employee is expected to report to the official workplace on a scheduled, or as-needed, basis.

Primary Workplace - The telecommuter's usual and customary workplace.

Alternate Workplace - A workplace other than the employee's usual and customary workplace (primary workplace) and may include the employee's home.

Telecommuting Agreement - The signed document that outlines the understanding between SCACAP and the employee regarding the telecommuting arrangement.

PROCEDURES

RULES

1. Participation is voluntary and subject to approval by the Executive Director. Participation is not an employee right or benefit, and may be discontinued at any time by either party. Denial or termination of a telecommuting arrangement is not appealable or grievable. Telecommuting may not be appropriate to all areas of the agency, especially those having limited staff. Individual work units may establish more specific criteria.
2. To be eligible for telecommuting, an employee should have completed six (6) months of satisfactory employment with SCACAP and be a member of a job class suitable for telecommuting. This six (6) month requirement may be waived at the discretion of the Executive Director in conjunction with the SCACAP Human Resources Coordinator. The employee must meet the skills and characteristics requirements identified for telecommuters. Employees in a warning period of substandard performance are not eligible for telecommuting.
3. Participation in telecommuting does not change the employee's salary, benefits, employment status, or other rights as an agency employee, nor does it alter the employment relationship with regard to applicable policies and procedures. Participation in telecommuting will be based upon the ability of the employee to perform tasks that can be completed from remote locations such as a home office, and upon management's assessment of the employee's ability to complete those tasks satisfactorily.
4. The employee has an obligation to provide the agency with a minimum of 37.5 working hours per week. The employee must not allow primary care duties for a child, elder, or other individual to affect the quality or quantity of work assigned. Telecommuters with dependent care issues are encouraged to have someone else provide dependent care services during the agreed-upon work hours.

CONDITIONS OF TELECOMMUTING

1. The employee's duties, responsibilities, and conditions of employment remain the same as if the employee were working at his or her Primary Workplace. The employee will continue to comply with federal, state, and agency laws, policies, and regulations while working at an alternate location. The employee shall remain subject to all agency disciplinary policies and procedures while performing work at the alternate workplace.
2. Telecommuting will not adversely affect an employee's eligibility for advancement or for any other employee rights or benefits. An employee will be compensated for all pay, leave, overtime (for non-exempt employees), and travel entitlement as if all duties were being performed at the employee's official workplace.
3. An employee must follow SCACAP policies regarding work hours and schedules, including keeping records of time and attendance as if the work were performed at the regular office. A regular telecommuting schedule must be established prior to the start of the work arrangement and must be mutually agreed upon by the employee and SCACAP management. Any change to the agreed-upon schedule must be approved by appropriate management and documented. An employee must forgo telecommuting if he or she is needed in the regular office on a regularly scheduled telecommuting day. The employee may also be called into the Primary Workplace or other agency office locations when necessary to meet operational needs. The manager or supervisor should provide reasonable notice whenever possible; however, the employee may be required to report to the office without advance notice, as needed.
4. Work hours, overtime compensation (for nonexempt employees), compensatory time, and leave benefits will not change as a result of telecommuting. Requests to work overtime or to use sick, annual, or other leave must be approved by the supervisor in the same manner as if the employee were working at the employee's primary workplace. An employee shall not work overtime unless authorized in advance by his or her supervisor or manager, or as otherwise authorized by the SCACAP Overtime Policy.
5. While working away from the Primary Workplace, employees must be accessible for communication (e.g., telephone, pager, e-mail).
6. The employee must designate a separate workspace in the Alternate Workplace for the purposes of telecommuting. The employee must maintain this area in a safe condition, free from hazards and other dangers to the employee, and SCACAP's equipment. To ensure the safety of the workspace, the employee must complete and return to the SCACAP Telecommuting Safety Checklist Form, which will certify that the employee's Alternate Workplace complies with health and safety requirements. The employee must submit this checklist to SCACAP before he or she may begin telecommuting. SCACAP shall have reasonable access to the Alternate Workplace for the purposes of inspection of the site and retrieval of

SCACAP-owned property if necessary. The employee must consult with SCACAP before moving any heavy equipment or furniture in the Alternate Workplace.

7. The Alternate Workplace is considered an extension of the employee's Primary Workplace; therefore, Worker's Compensation will continue to exist for the employee when performing official work duties in the area during approved telecommuting hours. Any work-related injuries must be reported immediately to the employee's supervisor and to the Human Resources Coordinator. The employee remains liable for injuries or damages to any person, or property of third parties, or members of his/her family while in the Alternate Workplace if it is located in the employee's home. The employee must further agree to indemnify and hold SCACAP harmless from any and all claims for losses, costs, or expenses asserted against the SCACAP by such third parties or members of the employee's family. The employee must agree to work at the Primary Workplace or the approved Alternate Workplace, and not from another unapproved site. Failure to comply with this provision may result in termination of the agreement and/or other appropriate disciplinary action. SCACAP agrees to establish agreed-upon expectations relative to the time the employee would need to spend in the Primary Workplace. SCACAP will attempt to give adequate notice when these expectations are subject to change; however, the employee may be required to report to the Primary Workplace without advance notice upon request by SCACAP.
8. SCACAP and the employee must agree upon the equipment to be used in telecommuting. SCACAP may provide all or part of the equipment necessary for accomplishing work assignments. When specified in an agreement, an employee may be authorized to use their own equipment.

Agency-Owned Equipment:

Agency-owned equipment may be used only for legitimate agency purposes by authorized employees. The employee must protect equipment provided by SCACAP against damage and unauthorized use. Agency-owned equipment used in the normal course of employment will be maintained, serviced, and repaired by the State.

Employee-Owned Equipment:

When employees are authorized to use their own equipment, SCACAP will not assume responsibility for the costs of repair, maintenance, or service.

1. The employee agrees that SCACAP shall have reasonable access to the Alternate Workplace for business-related purposes such as inspection of the space and retrieval of Agency property.
2. SCACAP's security controls and conditions for use of Agency-owned equipment for the Primary Workplace will also apply to the alternate workplace. All SCACAP records, files, documents, information and data must be protected from unauthorized disclosure or damage, and must be returned safely to the Primary Workplace. The employee will return all SCACAP equipment, files, records, documents, information and data to SCACAP immediately upon termination of telecommuting or of the employee's employment. The employee must abide by any rules promulgated by SCACAP concerning the use of computer equipment (which may include protecting the employee's home PC against computer "viruses"). The employee must follow SCACAP procedures for network access and take all necessary steps to protect the integrity of systems including, but not limited to: protecting passwords, not duplicating SCACAP-owned software, and not allowing SCACAP files to be viewed by others.
3. No employee engaged in telecommuting will be allowed to conduct face-to-face, agency-related business at his or her Alternate Workplace if the Alternate Workplace is in the employee's home.
4. An employee engaged in telecommuting may not seek mileage reimbursement for travel between the employee's home and an agency office building or facility in Columbia, South Carolina.
5. SCACAP will not be responsible for operating costs, home maintenance, or any other incidental costs (e.g., utilities, internet connection), associated with the use of the employee's residence, or for damages to the employee's property resulting from participation in the telecommuting program.
6. The employee must hold SCACAP harmless against any and all claims, excluding Workers' Compensation claims. The employee accepts responsibility for maintaining the security, condition, and confidentiality of SCACAP equipment and materials (including but not limited to files, applications, manuals, forms) that are located at the Alternate Workplace. In signing the Telecommuting Agreement, the employee must verify that the Alternate Workplace, if it is the employee's home, is free of safety and fire hazards.
7. The employee will meet with his/her supervisor to receive assignments and to review completed work. The employee will complete all assigned work according to procedures mutually agreed upon with the supervisor. The employee will

be required to adhere to those performance standards agreed upon with his/her manager for telecommuting purposes. The evaluation of the employee's job performance will be based on such established standards. Performance must remain satisfactory to remain in telecommuting status.

APPLICATION FOR TELECOMMUTING

An eligible employee shall complete the "Application for Telecommuting," Form, and submit the request to his or her supervisor or manager for review and final approval by the Human Resources Coordinator.

Requests for telecommuting will be considered on an individual basis to determine if the employee has the necessary skills and abilities to be a telecommuter, and if the duties or a portion of the duties of the employee's position can be adequately performed by telecommuting.

SCACAP must approve the request prior to the employee's beginning to telecommute. Upon approval of the request, the employee agrees to follow all requirements of SCACAP's Telecommuting Policy and any additional requirements agreed upon by SCACAP and the employee. The employee must also complete the "SCACAP Telecommuting Safety Checklist" Form to verify that the alternate workplace complies with agency requirements. The employee and appropriate management must sign the "Telecommuting Agreement," Form, which clearly outlines the expectations and responsibilities of the telecommuter and the agency.

TERMINATION OF TELECOMMUTING

SCACAP may terminate the telecommuting arrangement at any time with or without cause, and this determination is final in terms of administrative review. At such time and notification, the employee will resume his or her regular schedule at the Primary Workplace. SCACAP has the right to remove the employee from the program if participation fails to benefit organizational needs.

In the event the employee ceases employment with SCACAP, or the telecommuting arrangement is discontinued for any reason, the employee agrees to return immediately to SCACAP all SCACAP equipment, files, and supplies to the primary workplace or within a mutually agreed upon reasonable time period. If the employee fails to do so, he or she will reimburse SCACAP for all unreturned property. All work documents, records, information and data will be returned immediately to SCACAP. In addition, this agreement shall automatically terminate when the employee ceases to be employed by SCACAP. By participating in a telecommuting arrangement, the employee agrees that any termination of working from the alternate workplace will not constitute an involuntary reassignment under the Agency Employee Grievance Procedure Act.

Procedure Title:	Sexual and Other Discriminatory Harassment		
Procedure Number:	3.7	Effective Date:	October 1, 2018
Policy Title Reference:	3.7-Sexual and Other Discriminatory Harassment		
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHSDirector Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

All South Carolina Association of Community Action Partnerships to School Readiness (SCACAP) employees shall enjoy a work environment free of all forms of discrimination, including but not limited to sexual harassment. Any act of harassment by employees, supervisors, managers, SCACAP agents, vendors, contractors, or non-employees on SCACAP premises is unacceptable conduct and will not be tolerated.

Sexual harassment is a form of sex discrimination and is prohibited by Title VII of the Civil Rights Act of 1964. Therefore, it is a violation of this policy for any employee (or non-employee on SCACAP premises) to engage in any of the acts or behavior defined herein, and such misconduct will be subject to sanctions and/or disciplinary action up to and including dismissal.

Any employee who feels that he/she has been discriminated against on the basis of sex, or harassed or discriminated against in any manner, should immediately report such incidents in accordance with the procedures outlined below without fear of reprisal. All reports of harassment will be investigated in a timely manner. Retaliation against an employee or other person who reports in good faith a concern about harassment, or who provides information or assists in the investigation or disposition of the complaint, is strictly prohibited and will result in disciplinary action or sanctions.

This policy will be posted and distributed to all SCACAP employees. Training on this Policy is required for all employees.

Definitions

Sexual Harassment

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, when:

1. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
2. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or

3. Such conduct has the purpose or effect of substantially interfering with a person's work performance or creating an intimidating, hostile or offensive work environment.

Prohibited acts of sexual harassment can take a variety of forms ranging from subtle pressure for sexual favors to physical assault. Examples of the kinds of conduct included in the definition of sexual harassment are:

1. Threats or intimidation for sexual relations or sexual contact that is not freely or mutually agreeable to both parties;
2. Continual or repeated verbal abuses of a sexual nature including graphic commentaries; sexually suggestive objects or pictures placed in the work area that may embarrass or offend the person; sexually degrading words to describe the person, or propositions of a sexual nature;
3. Threats or insinuations that the person's employment, **wages**, promotional opportunities, job assignments, or other conditions of employment may be adversely affected by not submitting to sexual advances.

Discriminatory Harassment

Discriminatory Harassment is verbal or physical conduct that denigrates or shows hostility toward a person based on race, color, religion, sex, national origin, age, genetic information or disability when the conduct:

1. Has the purpose or effect of creating an intimidating, hostile, or offensive work environment; or
2. Has the purpose or effect of substantially interfering with an employee's work performance; or
3. Otherwise adversely affects an employee's employment opportunities.

Examples include, but are not limited to:

1. Continual or repeated verbal abuse, including epithets, slurs or threatening, intimidating or hostile acts or written or graphic materials in the workplace that denigrate or show hostility toward a person or group based on race, color, religion, sex, national origin, age, genetic information or disability;
2. Threats or insinuations that employment, wages, promotional opportunities, job assignments, or other conditions of employment may be adversely affected on the basis of race, color, religion, sex, national origin, age, genetic information, or disability.

PROCEDURES

COMPLAINT PROCEDURES

When an employee feels that he or she is a victim of sexual or other discriminatory harassment, the employee should take the following steps promptly:

1. SCACAP encourages any employee who believes that he/she has been subjected to any form of harassment to advise the offending individual that the conduct in question is offensive and request that it be discontinued immediately.
2. The employee should discuss the matter with his or her direct supervisor, the next highest-level supervisor in their chain of command, or the SCACAP Administrative Coordinator for Human Resources.

3. If the issues cannot be resolved at this stage, the employee should complete an Employee Harassment Statement of Complaint Form. The name(s) of the person(s) accused of wrongdoing along with the name(s) of any witnesses whose testimony will support the complaint should be stated on the complaint form. Any evidence to support the harassment should be included with the form. If the employee is unwilling or unable to complete the complaint form, the supervisor or other person receiving notice of the complaint must complete it.
4. Forward the complaint form directly to the SCACAP Administrative Coordinator for Human Resources in an envelope marked "Confidential".

INTERNAL INVESTIGATION

Incidents involving complaints of sexual or other discriminatory harassment will be handled in a sensitive and confidential manner. The Director will be responsible for coordinating all internal investigations. The following rules apply to all investigations of alleged harassment:

1. When a supervisor or other manager becomes aware that sexual or other discriminatory harassment may have occurred, he/she must notify the SCACAP Human Resources Coordinator immediately.
2. All investigations will be coordinated by the SCACAP Administrative Coordinator for Human Resources in consultation with the Director and the SCACAP Legal Counsel, as appropriate. An impartial investigation will be undertaken in a timely manner and all necessary steps taken to resolve the problem. All employees interviewed are required to cooperate with the investigator(s).
3. All verbal and written communications will be limited to only those individuals who have an official need-to-know resulting from their involvement in the investigation.
4. Persons accused of sexual harassment will be allowed an opportunity to respond to the charges.
5. Persons making a charge of sexual harassment will be informed of the results of the investigation and allowed to respond on their own behalf.
6. All information and/or evidence will be collected, recorded, and reviewed by the SCACAP Administrative Coordinator for Human Resources in consultation with the Director and the SCACAP Legal Counsel for appropriate action.
7. If an investigation reveals that misconduct has occurred, immediate disciplinary action **will be** initiated based on the facts of the case, up to and including dismissal.
8. If an investigation fails to support the complaint, no documentation concerning it will be placed in the file of the employee accused of harassment. No documentation will be placed in the complainant's file when the complaint is filed in good faith, whether the complaint is upheld or not.
9. The complainant will be notified that the investigation has been completed and appropriate action taken within 10 business days following final determination in the matter. Due to confidentiality requirements, specific disciplinary action will not be disclosed. The SCACAP Administrative Coordinator for Human Resources will make a follow-up inquiry to ensure that all harassment has ended.
10. Any employee who knowingly makes a false claim of harassment will be subject to disciplinary action in accordance with the SCACAP Progressive Discipline Policy.

11. Confidentiality will be maintained to the extent permitted by the circumstances of each case. Although all efforts will be made to maintain the confidentiality of complaints and investigations, SCACAP may need to disclose the name of the complainant during the course of the investigation in order to effectively investigate and resolve the matter, including to the party being charged with harassment. The employee and all persons involved and/or interviewed in the matter should not discuss the complaint with persons other than the supervisor/person in the chain of command, the SCACAP Administrative Coordinator for Human Resources and/or other persons involved in investigating the complaint. A breach of confidentiality by any employee involved in the investigation or who through his/her position is privy to the information gathered, including the alleged victim and harasser, will be subject to disciplinary action up to and including dismissal.

Procedure Title:	FMLA- Family Medical Leave Act		
Procedure Number	3.8	Effective Date:	October 1, 2018
Policy Title Reference:	3.8 - FMLA- Family Medical Leave Act		
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

Pursuant to the Family and Medical Leave Act of 1993 (**FMLA**), eligible employees of South Carolina Association of Community Action Partnerships to School Readiness (SCACAP) may take up to twelve (12) weeks paid and/or unpaid leave for specified family and medical reasons. Should the employee fail to return to work after the use of FMLA, they can be required to reimburse the organization for used sick leave. SCACAP will not interfere, restrain, or deny the exercise of any rights provided by the Family and Medical Leave Act.

DEFINITIONS

FMLA - Family Medical Leave Act
 SCACAP - South Carolina Association of Community Action Partnerships

PROCEDURES

I. ELIGIBILITY

SCACAP employees who have worked for the agency at least twelve (12) months, whether or not the twelve months are consecutive, and who have worked at least 1,250 hours (defined as FLSA compensable hours of work) during the previous twelve (12) months, including "on-call" hours, and if employed at a work site where fifty (50) or more employees are employed by the employer within seventy-five (75) miles of that work site, may be eligible for FMLA leave. The right to take leave under FMLA applies equally to eligible male and female employees.

Spouses who are both employed by the agency and are eligible for FMLA leave are limited in the amount of FMLA leave they may take. If a husband or wife entitled to FMLA is employed by another organization and both take leave for the birth and care of a child, or placement and care of a child, or to care for a child or parent with a serious health condition, the aggregate number of work weeks of leave to which both may be entitled may not exceed twelve (12) work weeks during any calendar year. For military caregiver leave, the employee and employee's spouse may be limited to a combined total of 26 weeks of leave in a single calendar year.

SCACAP is considered a single employer for the purpose of determining FMLA leave.

II. LEAVE ENTITLEMENT

An eligible employee shall be granted up to a total of twelve (12) work weeks of paid/unpaid leave in each 12-month period on a continuous or intermittent basis for one (1) or more of the following reasons:

- A. Birth of a child and to care for the newborn, or placement of a child with the employee for adoption or foster care;
- B. For the care of a spouse, child, or parent with a serious health condition;
- C. For the employee's own serious health condition which makes the employee unable to perform the essential functions of his or her position; or
- D. For a qualifying exigency caused by the call to active duty of an eligible employee's spouse, child, or parent who is a member of the Armed Forces; and qualifying exigencies can include: 1) short notice deployment (seven or less calendar days prior to the date of deployment); 2) attending military events and related activities including official military ceremonies and events related to the call to duty or to attend family support of assistance programs or briefings; 3) childcare and related activities for a military member's child arising from the covered active duty such as arranging for alternative childcare or enrolling or transferring a child to a new school or day care facility; 4) activities arising from the military member's covered active duty related to care of the military member's parent who is incapable of self-care, such as arranging alternative care, admitting or transferring a parent to a new care facility, and attending meetings with staff at a care facility; 5) financial and legal arrangements; 6) counseling provided by someone other than a health care provider for the employee, the military member or the child of the military member, provided the need for counseling arises from the active duty call; 7) rest and recuperation leave of the military member (eligible employees may take up to 15 calendar days of leave beginning on the date the military member commences the rest and recuperation leave); 8) post deployment activities sponsored by the military (available for up to 90 days after termination of active duty status) or to address issues arising from the death of a covered military member on active duty status; and 9) additional activities arising out of the covered military member's active duty or call to active duty status not encompassed in other categories but agreed upon as a qualified exigency by the organization and the employee.
- E. To care for a spouse, child, parent, or next of kin who is a service member and is injured or who becomes seriously ill while on active duty.

Generally, the 12-month period under South Carolina State Government is a calendar year; the exceptions are leave for the birth of a child and to care for the newborn child and for the placement of a child for adoption or foster care. In these exceptions, the 12-month period expires 12 months after the child's birth or placement.

Military Caregiver Leave

Under the military caregiver leave provisions, an eligible employee who is the spouse, son, daughter, parent, or next of kin of a current member of the Armed Forces, including a member of the National Guard or Reserves, may be entitled to up to a total of 26 workweeks during a single 12-month period to care for the service member who has a serious injury or illness incurred in the line of duty on active duty that may render the service member medically unfit to perform his or her duties; for which the service member is undergoing medical treatment, recuperation, or therapy, or is in an outpatient status; or is on the temporary disability retired list.

In addition, an eligible employee who is the spouse, son, daughter, parent, or next of kin of a covered veteran with a serious injury or illness may be entitled to take up to a total of 26 workweeks during a single 12-month period to care for a covered

veteran undergoing medical treatment, recuperation, or therapy for a qualifying serious injury or illness. A "covered veteran" was a member of the Armed Forces (including the National Guard or Reserves), discharged or released under conditions other than dishonorable within the five-year period before the employee first takes FMLA military caregiver leave to care for the veteran. A serious illness or injury means an illness or injury that rendered the veteran medically unfit to perform military duties, or that qualifies the veteran for certain benefits from the Department of Veterans Affairs, or substantially impairs the ability to work. This includes injuries or illnesses incurred or aggravated during military service but that did not manifest until after the veteran left active duty.

The caregiver leave year begins the day the leave begins.

III. DEFINITIONS

- A. Spouse - a husband or wife as defined or recognized under state law for purposes of marriage, including a common law marriage where it is recognized.
- B. Parent - a biological, adoptive, step or foster parent or an individual who stands or stood in loco parentis to an employee when the employee was a child. This term does not include "parents-in-law."
- C. Son or daughter - a biological, adopted or foster child, a stepchild, a legal ward, or a child of a person standing in loco parentis, who is either under age eighteen (18), or age eighteen (18) or older and incapable of self-care because of a mental or physical disability.
- D. Serious health condition - an illness, injury, impairment, or physical or mental condition that involves continuous treatment by a healthcare provider which includes:
 - 1. An illness, injury, impairment, or physical or mental condition that involves inpatient care (i.e. an overnight stay) in a hospital, hospice or residential medical-care facility, including any period of incapacity or subsequent treatment; or
 - 2. A period of incapacity lasting more than three (3) consecutive full calendar days, combined with at least two visits to a health care provider for treatment within the first 30 days of incapacity, or one visit within 7 days of the first day of incapacity and a regimen of continuing treatment; or
 - 3. Any period of incapacity related to pregnancy or for prenatal care; or
 - 4. Any period of incapacity or treatment for a chronic serious health condition that continues over an extended period of time, requires periodic visits to a healthcare provider(s) (at least twice a year), and may involve occasional episodes of incapacity. A visit to a healthcare provider is not necessary for each absence; or
 - 5. A period of incapacity that is permanent or long-term due to a condition for which treatment may not be effective. Only supervision by a healthcare provider is required rather than treatment; or
 - 6. Any absences to receive multiple treatments for restorative surgery after an accident or injury or for a condition that would likely result in a period of incapacity for more than three (3) days if not treated.

IV. SCHEDULING FMLA LEAVE (Notice of Need, Medical and Other Certifications)

Notice of Need for Leave

An eligible employee requesting FMLA must, when foreseeable, give thirty (30) days advance notice to his or her supervisor of the need to take FMLA leave. When a 30-day notice is not possible, the employee must provide notice as soon as practicable and must comply with SCACAP's normal call-in procedures. When leave is needed to care for an immediate family member or due to the employee's own illness and is for planned medical treatment, the employee must work with his or her supervisor to schedule the leave so as not to unduly disrupt the office's operations.

Medical and Other Certifications

SCACAP requires employees requesting FMLA leave to provide medical certification supporting the need for leave due to a serious health condition affecting the employee or a spouse, child or parent, or for military caregiver leave. In most cases the employee must provide the medical certification within 15 calendar days. SCACAP may also require periodic recertification of a serious health condition and documentation to confirm familial relationships. Separate certification may be required to confirm the nature of the family member's military service or the existence of a qualifying exigency.

SCACAP, at its own expense, may require a second medical certification by a health care provider of its own choosing, with some limitations imposed by the FMLA, if it has reason to doubt the validity of the medical certification provided by the employee. In lieu of a second certification, SCACAP may contact the health care provider directly to clarify or authenticate a medical certification, including certifications for military caregiver leave, after giving the employee an opportunity to cure any deficiencies in the certification.

An employee's refusal to provide medical certification or other required documentation may lead to a denial or delay in approval of the employee's FMLA leave request.

For a serious health condition affecting the employee, Certification of Health Care Provider for Employee's Serious Health Condition (Family and Medical Leave Act) Form must be completed by the attending physician. Employees requesting FMLA must state their intent to return to work after the completion of FMLA leave.

To care for an immediate family member, the employee must complete the Certification of Health Care Provider for Family Member's Serious Health Condition (Family and Medical Leave Act) Form.

When leave is needed under the military caregiver provisions, the employee must complete Certification of Qualifying Exigency for Military Family Leave (Family and Medical Leave Act) Form or Certification for Serious Injury of Illness of Covered Service member for Military Family Leave (Family and Medical Leave Act) Form.

V. CHARGING FMLA LEAVE (Notification and Designation)

The South Carolina Association of Community Action Partnerships to School Readiness (SCACAP) will notify the employee of his or her eligibility to take leave. The SC Department of Education will declare leave as FMLA leave based on information provided by the employee.

- A. When (SCACAP) designates leave as FMLA leave, it must notify the employee. (SCACAP) will inform the employee of his or her rights and responsibilities under FMLA.
- B. An eligible employee's FMLA leave allowance shall be charged for the actual time (or at a maximum in quarter-hour increments) an employee must be away from the job.
- C. For an employee to remain in pay status, they must use either accrued annual leave or sick leave (10 days sickness in the immediate family) depending on the circumstance of the FMLA leave. Sick leave must be used before unpaid leave if the FMLA leave is for the employee's serious health condition. Annual leave may be used in lieu of unpaid leave for FMLA leave. FMLA leave will run concurrently with other leave types such as

worker's compensation, administrative leave, sick leave, annual leave, and leave without pay, when applicable. FMLA leave will be charged against all applicable leave types.

VI. INTERMITTENT FLMA LEAVE AND REDUCED SCHEDULE

If medically necessary, eligible employees may take FMLA leave on an intermittent basis or on a reduced schedule for their own serious health condition, the serious health condition of a spouse, daughter, son, or for military caregiver leave.

Leave due to the birth or placement of a child may be taken intermittently and must be completed within the 12-month period beginning on the date of birth or placement of the child, and is subject to the supervisor's approval.

Employees needing intermittent/reduced schedule leave for foreseeable medical treatment must work with their supervisor to schedule the leave so as not to unduly disrupt SCACAP operations, subject to the approval of the health care provider. In such cases, SCACAP may transfer the employee temporarily to an alternative job with equivalent pay and benefits that better accommodates recurring periods of leave than the employee's regular job.

VII. MAINTENANCE OF HEALTH BENEFITS

SCACAP is required to maintain group health insurance for an employee on FMLA leave whenever such insurance was provided before the leave was taken, and on the same terms as if the employee had continued to work. The employee must continue to pay his or her share of health insurance premiums while on FMLA leave. SCACAP reserves the right to recover premiums it paid to maintain health coverage for an employee who fails to return to work from FMLA leave.

VIII. TRANSFER OF FMLA LEAVE

For eligible employees who transfer from one state organization to another, the transferring organization is responsible for transferring the employee's FMLA leave records to the receiving organization.

IX. **JOB** RESTORATION

Upon return from FMLA leave, an employee who can still safely perform the position's essential functions is entitled to return to the same position the employee held when the FMLA leave commenced, or to an equivalent position with equivalent benefits, pay, and other terms and conditions of employment. That position must involve the same or substantially similar duties and responsibilities, which must entail equivalent skill, effort, responsibility and authority.

Procedure Title:	Alcohol and Drug Use		
Procedure Number:	3.9	Effective Date:	October 1, 2018
Policy Title Reference:	3.9-Alcohol and Drug Use		
Regulation References:			
Forms:	III	III	
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

It is the policy of South Carolina Association of Community Action Partnerships to School Readiness (SCACAP) that the unlawful manufacture, distribution, dispensation, possession, or use of alcohol or illegal drugs at the workplace or while conducting organization business off organization premises is absolutely prohibited. Employees shall not be under the influence of or use alcohol or any other drugs or narcotics at the workplace or during assigned work hours, or in any manner that may impair their ability to perform assigned duties or otherwise adversely affect the image of SCACAP. Violations of this policy will result in disciplinary action up to and including termination, and may have legal consequences. Employees who suffer from alcoholism or drug addiction may be referred for counseling or treatment, but will be held to the same performance and conduct standards as other employees.

DEFINITIONS

SCACAP - South Carolina Association of Community Action Partnerships

PROCEDURE

The purpose of this Policy is to prohibit on-the-job use or possession of alcohol or illegal drugs and to make employees and supervisors aware of the consequences of substance abuse or misuse, and the assistance that is available.

Employees are expected and required to report to work on time and in appropriate mental and condition for work. It is SCACAPs intent and obligation to provide a drug-free, healthful, safe, and secure work environment.

If there is reasonable suspicion that an employee is working under the influence of alcohol or drugs, the immediate supervisor(s) will meet with the employee to discuss the problem. The supervisor may ask the employee to submit immediately to a test. A positive drug or alcohol test may result in disciplinary action consistent with the SCACAP Progressive Discipline Policy. However, if the employee enters and successfully completes the Vocational Rehabilitation Job Retention

Program, or an acceptable alternative, no disciplinary action will occur as long as the employee performs assignments safely and efficiently. A repeated violation of this Policy may result in severe disciplinary action, including termination of employment. Refusal to participate in a drug or alcohol test or to enter the Job Retention Program or an acceptable alternative will result in immediate removal from the workplace and may result in termination.

Employees must, as a condition of employment, abide by this Policy and report any conviction under a criminal drug statute for violations occurring on or off organization premises while conducting organization business. A report of a conviction must be made within five (5) business days after the conviction to the SCACAP Human Resources Coordinator. Failure to notify the organization as required may result in disciplinary action in accordance with the SCACAP Progressive Discipline Policy.

SCACAP acknowledges alcoholism and drug addiction are treatable medical illnesses. Employees with such problems may voluntarily submit themselves for professional help through the services provided by the S.C. Commission on Alcohol and Drug Abuse, SC Employee Intervention Program (SC Department of Vocational Rehabilitation) and the SC Group Health Plan, or they may be referred to the programs by their immediate supervisor.

Participation in the Employee Intervention Program, or an acceptable alternative for any alcohol or drug problems, will not jeopardize an employee's job. However, participation in such a treatment program will not relieve an employee of the responsibility to perform assigned duties safely and efficiently.

1. The Human Resources Coordinator should be notified immediately if a supervisor is requiring an employee under reasonable suspicion of being under the influence of alcohol or drugs. The Human Resources Coordinator will identify a facility to take the employee for testing.
2. The employee should be escorted to the testing facility by the employee's supervisor or someone else in the chain of command. A state vehicle may be used to transport the employee for testing. In appropriate circumstances, more than one person may be needed to escort the employee following consultation with the Human Resources Coordinator.
3. The Human Resources Coordinator will contact the testing facility prior to the employee arriving at the facility and provide all necessary information.
4. If the employee cannot remain at work, the supervisor or someone in the chain of command may be required to drive the employee home, or ask the employee for the contact information for someone to pick them up. Under no circumstances should an intoxicated employee drive.
5. The timeframe for receiving testing results will depend upon the type of test, but results will be requested as soon as possible.
6. If the employee refuses testing, contact Human Resources immediately for assistance.

Procedure Title:	Family Privacy Protection Act		
Procedure Number	3.10	Effective Date:	October 1, 2018
Policy Title Reference:	3.10 - Family Privacy Protection Act		
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates,			

POLICY

South Carolina Association of Community Action Partnerships to School Readiness (SCACAP) collects, maintains, and releases Personal Information about citizens of the State subject to the requirements of the Family Privacy Protection Act (the Act), S. C. Code Ann. §§ 30-2-10 *et seq.* The collection of Personal Information is limited to information required by federal and state law and necessary to fulfill a Legitimate Public Purpose. SCACAP will take reasonable measures to limit release of Personal Information and will notify and instruct employees of their responsibilities concerning the protection of Personal Information. Citizens must be advised that any Personal Information collected by SCACAP may be subject to public scrutiny or release.

SCACAP is responsible under state law for the proper maintenance and disposition of records containing Personal Identifying Information about individuals. Employees must comply with specific restrictions and requirements regarding the collection, maintenance, disclosure, and disposition of records containing social security numbers and other Personal Identifying Information from individuals, pursuant to S.C. Code Ann. §§ 30-2-300 *et seq.*, and SCACAP policy and procedures. As an employer, SCACAP has a legitimate need to collect and use this information in administration and the provision of employee benefit programs.

SCACAP must disclose a Breach of the Security of a System containing computerized data to a resident whose unencrypted and unredacted Personal Identifying Information was, or is reasonably believed to have been, acquired by an unauthorized person when illegal use of the information may occur or a material risk of harm exists. If more than 1,000 persons must be notified, the Department will also notify the Consumer Protection Division of the Department of Consumer Affairs and consumer reporting agencies as provided in law, S.C. Code Ann. § 1-11-490.

Persons and private entities are prohibited from obtaining or using any Personal Information obtained from SCACAP for Commercial Solicitation. SCACAP will take reasonable measures to ensure compliance, including notifying persons or entities submitting FOIA requests of this prohibition.

DEFINITIONS

Personal Information. Information that identifies or describes an individual including, but not limited to, an individual's photograph or digitized image, social security number, date of birth, driver's identification number, name, home address, home telephone number, medical or disability information, education level, financial status, bank account(s) number(s),

account or identification number issued by and/or used by any federal or state governmental organization or private financial institution, employment history, height, weight, race, other physical details, signature, biometric identifiers, and any credit records or reports.

Personal Identifying Information. Includes, but is not limited to:

- (1) social security number;
- (2) driver's license number or state identification card number issued instead of a driver's license;
- (3) checking account number;
- (4) savings account number;
- (5) credit card number;
- (6) debit card number;
- (7) personal identification (PIN) number;
- (8) electronic identification number;
- (9) digital signature;
- (10) date of birth;
- (11) current or former names, including first and last names, middle and last names, or first, middle and last names, but only when the names are used in combination with, and linked to, other identifying information provided in [this list];
- (12) current or former addresses, but only when the addresses are used in combination with, and linked to, other identifying information provided in this section; or
- (13) other numbers, passwords, or information which may be used to access a person's financial resources, numbers, or information issued by a governmental or regulatory entity that uniquely will identify an individual or an individual's financial resources.

The term does not include electronic identification names, including electronic mail addresses, or parent's legal surname before marriage.

Legitimate Public Purpose. A purpose or use which falls clearly within the statutory charge or mandates of an organization, board, commission, institution, department, or other state entity.

Breach of the Security of the System. Unauthorized access to and acquisition of computerized data that was not rendered unusable through encryption, redaction, or other methods that compromise the security, confidentiality, or integrity of personal identifying information maintained by the organization, when illegal use of the information has occurred or is reasonably likely to occur or use of the information creates a material risk of harm to the consumer.

Commercial Solicitation. Contact by telephone, mail, or electronic mail for the purpose of selling or marketing a consumer product or service. 'Commercial solicitation' does not include contact by whatever means for the purpose of:

- a) offering membership in a credit union;
- b) notification of continuing education opportunities sponsored by not-for-profit professional associations;
- c) selling or marketing banking, insurance, securities, or commodities services provided by an institution or entity defined in or required to comply with the Federal Gramm-Leach-Bliley Financial Modernization Act, 113 Stat. 1338; or
- d) contacting persons for political purposes using information on file with state or local voter registration offices.

Social Security Number. For purposes of this Policy/Procedures, social security number means an individual's social security number containing six digits or more.

PROCEDURES

Collection, Maintenance and Disposition of Social Security Numbers and Personal Identifying Information

1. SCACAP must use the following procedures when collecting, maintaining of disposing of records containing social security numbers and other Personal Identifying Information:
 - a) SCACAP may not collect a social security number unless authorized by law or collection is imperative to perform SCACAP responsibilities as required by law, and the social security number is relevant to the purpose for which collected. A social security number shall not be collected until and unless the need has been clearly documented.
 - b) SCACAP must segregate the social security number on a separate page from the rest of the record or otherwise so that it may be easily redacted when responding to a FOIA request.
 - c) Upon request of the individual whose social security number is being collected, SCACAP must provide before or at the time of collection a statement of the purpose for the collection or use.
 - d) SCACAP may not use the social security number for any purpose other than the purpose stated to justify its collection.
 - e) SCACAP may not intentionally disclose an individual's social security number or other Personal Identifying Information to the public.
 - f) SCACAP may not intentionally print or imbed a social security number on any card required for an individual to access government services.
 - g) SCACAP may not require an individual to transmit a social security number over the Internet unless the connection is secure or the number is encrypted.
 - h) SCACAP may not require an individual to use a social security number to access an Internet site unless a password or other unique personal identification number or other authentication device is also required for access.
 - i) SCACAP cannot print an individual's social security number on materials mailed to the individual unless federal or state law requires the number on the mailed documents.

2. SCACAP must remove all personal and confidential information before transferring or disposing of information technology hardware or storage media. *The hardware and storage media must be sanitized according to requirements established by the organization in accordance with the State Department of Administration, Division of Information Security. The SCACAP Information Technology/Information Security Manager or contracted entity must verify removal and sanitization before the transfer or disposal occurs.*

3. SCACAP must dispose of a record containing Personal Identifying Information by shredding, erasing, or otherwise making the information unreadable or undecipherable, in accordance with organization policies and procedures.

Disclosure of Social Security Numbers and Personal Identifying Information

SCACAP may only disclose social security numbers and Personal Identifying Information:

1. to another government entity if necessary for the entity to perform its responsibilities;
2. pursuant to a valid court order, warrant or subpoena;
3. for public health purposes;
4. on a recorded document in official county records or filed in official records of the courts; and
5. for employment verification to an employer or in the course of administration or provision of employee benefits programs, claims, and procedures related to employment.

Breach Notification Procedures

Pursuant to S.C. Code Section 1-11-490, state agencies who own or license computerized data or other data that includes Personal Identifying Information must disclose to a state resident a Breach of the Security of the System following discovery

or notification of a breach of unredacted or unencrypted Information. The notification requirements apply if the information was, or is reasonably believed to have been, acquired by an unauthorized person when the illegal use of the information has occurred or is reasonably likely to occur or use of the information creates a material risk of harm to the individual.

SCACAP must notify the resident whose information was breached in the most expedient time possible, and without unreasonable delay, consistent with legitimate law enforcement needs or measures necessary to determine the scope of the breach and restore reasonable integrity of the data system. Notice may be provided by:

1. Written notice;
2. Electronic notice if that is the primary method of communication with the individual;
3. Telephone notice;
4. Substitute notice if the cost of providing notice exceeds \$250,000, or the affected class of persons to be notified exceeds \$500,000, or SCACAP has insufficient contact information. Substitute notice may be by email if an email address is available, by posting the notice conspicuously on the organization website, or by notification to major statewide media.

SCACAP may delay notification if a law enforcement organization determines notification impedes a criminal investigation. If so, notification must be made after the law enforcement organization determines it will no longer compromise the investigation.

An organization may be in compliance with these notification requirements if it notifies affected persons in compliance with its own notification procedures as part of an information security policy for treatment of Personal Identifying Information and the organization's notification is otherwise consistent with these time requirements.

If more than one thousand persons must receive notice, SCACAP must also notify without unreasonable delay the Consumer Protection Division of the Department of Consumer Affairs, and all consumer reporting agencies that compile and maintain files on a nationwide basis, of the timing, distribution, and content of the notice given.

Procedure Title:	Fraud, Waste and Abuse		
Procedure Number:	3.11	Effective Date:	October 1, 2018
Policy Title Reference:	3.11- Fraud, Waste and Abuse		
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

South Carolina - SCACAP to School Readiness (SCACAP) promotes compliance with federal and state laws to combat fraud, waste and abuse in government programs. Efforts to detect and prevent fraud, waste and abuse include educating all employees, including management, about applicable legal requirements; providing detailed information about the federal False Claims Act and other laws pertaining to civil or criminal penalties for false claims or statements and whistleblower protection under the laws; and requiring and encouraging reporting of potential violations of law.

The Deficit Reduction Act of 2005 requires the organization to provide employees, contractors and agents with general information on the federal False Claims Act, federal Program Fraud Civil Remedies Act, state laws pertaining to civil and criminal penalties for false claims and statements, and whistleblower protections for reporting individuals under such laws.

No organization employee, agent, or contractor shall direct, participate in, approve, or tolerate any violation of these laws. In addition, no employee, subcontractor, or grantee may be discharged, demoted, or otherwise discriminated against as a reprisal for disclosing information that an employee reasonably believes is evidence of gross mismanagement of a federal contract or grant, a gross waste of Federal funds, an abuse of authority relating to a Federal contract or grant, a substantial and specific danger to public health or safety, or a violation of law, rule or regulation related to a federal contract or grant to any of the following:

-
- 1) A member of congress or a representative of a committee of Congress;
 - 2) An Inspector General
 - 3) The Government Accountability Office
 - 4) A Federal Employee responsible for contract or grant oversight or management at the relevant organization;
 - 5) An authorized official of the Department of Justice or other law enforcement organization;
 - 6) A court or grand jury;
 - 7) A management official or other employee of the contractor, subcontractor, or grantee who has the responsibility to investigate, discover, or address misconduct.
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If any employee, subcontractor, or grantee believes that he or she has been subjected to a reprisal, then he or she may file a complaint with the Inspector General of the executive Organization involved. Complaints must be filed within three years of the date on which the alleged reprisal took place.

REPORTING FRAUD, WASTE AND ABUSE

SCACAP employees should be aware of and utilize the organization's reporting procedures to report suspected unlawful or improper activities in accordance with this Policy. Reportable matters include, among other things, suspected violations of federal or state laws, inappropriate procurement practices, suspected abuse of state or organization policies and procedures, suspected fraud and embezzlement, and incidents of harassment or violence in the workplace. Complaints will be evaluated and investigated and appropriate corrective measures taken in accordance with organization policies and procedures.

SCACAP must also include contact information for reporting suspected unlawful or improper activities in accordance with this Policy.

DEFINITIONS

Whistleblower - an employee who reports fraud and/or abuse in connection with state or federal laws provided below and would qualify for protections from reprisals.

PROCEDURES

1. Any person who knows or reasonably believes the organization or any member of its management, staff, or any contractor or partner may be involved in any activity prohibited by the False Claims Act, similar state laws, or other fraud and abuse laws is required to immediately report the information by either communicating with their supervisor(s), other members of management, or by contacting the SCACAP Office Manager at phone number or email.
2. SCACAP will not take any intimidating or retaliatory action against an individual as a result of the person's good faith report of practices reasonably believed to violate this policy. SCACAP is not prohibited from taking adverse employment actions against an employee for matters unrelated to the report.
3. An employee, contractor, partner, or organization of SCACAP who submits a false claim in violation of federal or state laws will be reported to the necessary authorities.
4. SCACAP will make available to all staff, contractors and partners written materials regarding compliance with the federal False Claims Act and other relevant federal and state laws in Appendix A.
5. Individuals submitting complaints have the right to remain anonymous. However, anonymous complaints are more difficult to investigate and resolve.
6. The individual submitting the complaint should provide specific information necessary to investigate the allegations/complaints made, including the names and locations of witnesses and any tangible evidence of wrongdoing such as signed contracts, emails, etc.
7. Individuals will be informed they are not required to discuss their complaint or related information with anyone other than the investigator(s).
8. Following investigation, the investigator in coordination with appropriate management and legal counsel will determine additional actions to be taken. These may include conducting additional work to determine the extent of the fraud, abuse or illegal actions; or referring the case to appropriate law enforcement authorities or other state or federal authorities. SCACAP staff will assist outside law enforcement or other state or federal authorities in any way required to facilitate the investigation.

Procedure Title:	Nondiscrimination		
Procedure Number:	3.12	Effective Date:	January 20, 2017
Sub Procedures			
Policy Title Reference:	3.12 – Nondiscrimination		
Regulation References:			
Forms:	III		
SCACAP Executive Director Approval Date:	January 20, 2017	EHS Director Approval Date:	January 20, 2017
Revisions Dates			

POLICY

South Carolina Association of Community Action Partnerships to School Readiness (SCACAP) employees will fully comply with the nondiscrimination provisions of all state and federal laws, rules, and regulations. Any employee who engages in discriminatory conduct or interferes with the discrimination complaint process will be subject to disciplinary action, up to and including immediate termination.

SCACAP prohibits discrimination in employment practices and the delivery of services.

SCACAP does not discriminate on the basis of age, disability, race, color, sex, pregnancy, religion, or national origin. SCACAP does not discriminate against employees on the basis of genetic information.

Denials of service or unfavorable speech, actions, or employment decisions based on any of the above-mentioned characters of job applicants, employees, contractors, vendors, program applicants or participants, or others affiliated with SCACAP will not be tolerated and may lead to disciplinary action, up to and including immediate termination.

As SCACAP is a recipient of various contracts and grants, employees in certain areas of the Organization may be subject to program specific civil rights training and compliance requirements. Employees within the designated programs are required to adhere to any program-specific civil rights training and compliance requirements.

DEFINITIONS

SCACAP - South Carolina Association of Community Action Partnerships

PROCEDURES

SCACAP will take prompt and reasonable action to investigate, respond to, and resolve discrimination complaints. Any person who believes they have been subjected to discrimination on the basis of age, disability, race, color, sex, pregnancy, religion, or national origin in any SCACAP programs, services, or employment activities may file a complaint with the SCACAP Office Manager by:

1. Emailing a written complaint to: **Office Manager, jalexander@scacap.org**
2. Complaints may be submitted in writing at any SCACAP local office, or at the SCACAP EHS-Office office at **2711 Middleburg Dr. SUITE 208 Columbia, SC 29204**, or mailed directly to that address.

3. Complaints may be taken via telephone by calling 803-401-5490.

Complaints should contain the following information:

1. The name and contact information of the person filing the complaint
2. The date of the complaint
3. The alleged basis of the discrimination claim (i.e. age, disability, race, color, sex, pregnancy, religion, or national origin)
4. Date of the incident (if different from date the complaint was filed or presented to SCACAP)
5. Location of the incident
6. Description of the incident
7. Name(s) of employee(s) involved in the incident, if applicable
8. Name of the SCACAP program or service involved, if applicable

The Office Manager will notify the appropriate program supervisor and management of receipt of the complaint. SCACAP will respond to the complaint within thirty (30) calendar days and will take reasonable steps to resolve the matter. For certain programs, SCACAP may be required to forward the complaint to the federal entity that oversees the program's administration. In those cases, the person filing the complaint will be notified of that process. If the investigation demonstrates failure to follow the SCACAP Nondiscrimination Policy or other applicable policies, the matter will be referred for possible disciplinary action to the employee's supervisor and the Human Resources Coordinator.

SCACAP will take the following steps to ensure the discrimination complaint process is accessible:

1. The SCACAP external website will include information on the discrimination complaint process and contact information.
2. SCACAP offices will display notices in areas accessible by the general public that detail the organization's discrimination complaint process.
3. SCACAP will review annually the effectiveness of the discrimination complaint process and revise the process as necessary.

SCACAP employees are required to take the following actions related to discrimination complaints:

1. Provide any Interested persons with information on the organization's discrimination complaint process and contact information for the Office Manager.
2. Immediately forward all discrimination complaints to the Office Manager.
3. Cooperate fully in any Investigation and follow-up actions.

Employees are strongly encouraged to report any discriminatory conduct by another employee that they witness during the course of their employment.

SCACAP Partners, Contractors and Vendors

SCACAP partners, contractors and vendors must adhere to nondiscrimination provisions in contracts and applicable nondiscrimination laws. A complaint received regarding alleged discrimination by a SCACAP partner, contractor or vendor must be handled in accordance with the Procedures in this Policy.

Procedure Title:	Workplace Violence		
Procedure Number:	3.13	Effective Date:	October 1, 2018
Sub Procedures			
Policy Title Reference:	3.13 -Workplace Violence		
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

South Carolina Association of Community Action Partnerships to School Readiness (SCACAP) has a zero tolerance policy regarding acts or threats of violence in the workplace. This includes violence committed by or against SCACAP employees or members of the public. Acts of violence in the workplace will be investigated and violators will be dealt with accordingly, including dismissal from employment and/or arrest and prosecution.

SPECIFIC EXAMPLES OF PROHIBITED CONDUCT INCLUDE, BUT ARE NOT LIMITED TO:

- Hitting or shoving an individual;
- Threatening to harm an individual or his/her family, friends, associates or their property (This includes physical and verbal threats or gestures reasonably perceived to harm another individual or endanger the safety of an individual);
- Making harassing or threatening telephone calls or sending letters or other forms of written or electronic communications;
- Harassing surveillance (stalking) which is the willful, malicious, repeated following of another person and/or making a threat with intent to place the other person in reasonable fear of his/her safety;
- Making a suggestion or otherwise intimidating an act to injure persons or property; and
- Unauthorized possession or inappropriate use of firearms, weapons, or any other dangerous devices on any property which the SCACAP owns or leases. This provision also includes organization vehicles.

Potential Offenders

Watch for these signs of potentially dangerous behavior by an individual:

- Past history of violence
- Extreme stress in an individual's life
- Evidence of chemical dependency
- An obsession with weapons
- Any harassing behavior to others

- Destructive behavior
- Obsession with retaliation after being disciplined or reprimanded
- Drastic change or deterioration in physical appearance
- Significant changes in work performance or other behavior
- Co-worker's fear of an individual

Discipline Process

Employees who are disciplined may respond angrily to supervisors and even co-workers to what they perceive as unfair treatment by management. The following should be considered when dealing with employee discipline:

- Prior to discipline, assess the employee's potential for violence when planning the disciplinary meeting. The supervisor and another member of management should meet with the employee to present the disciplinary action.
- Conduct a discipline session privately in a professional manner to avoid further incitement of hostile behavior by the employee.
- If it is necessary to dismiss an employee, conduct the dismissal session if possible at the end of the workday when other employees have left the workplace.
- Clearly explain the reason(s) for discipline.
- Provide an opportunity for the employee to discuss his/her disagreement with the disciplinary decision.
- Offer counseling services as appropriate. Information regarding counseling services may be obtained by contacting the Human Resources Coordinator.

Employees should refrain from acts of violence and seek assistance to resolve personal issues that may lead to violence. SCACAP is committed to providing, as reasonably allowed, a safe environment.

DEFINITIONS

SCACAP - South Carolina Association of Community Action Partnerships

PROCEDURES

If a violent act is committed in the workplace, the SCACAP Human Resources Coordinator will oversee necessary investigations, coordinate stress-debriefing sessions, and provide necessary assistance through the Employee Assistance Program.

Any indication of violence in the workplace must be immediately brought to the attention of the supervisor and the SCACAP Human Resources Coordinator. If there is an indication of violence in an outside location, contact local law enforcement authorities, the appropriate supervisor, and the Human Resources Coordinator.

Reporting an Incident

- **If the act constitutes a severe emergency, call 911 before calling the officials designated.**
- Any employee who experiences or witnesses a violent act, conduct, behavior, or communication must immediately contact his/her supervisor and the Human Resources Coordinator. Employees should not attempt to take action themselves unless their life is threatened.
- Any supervisor who receives a complaint of violence, threats, or harassment, or who has reason to suspect that these acts or behaviors are occurring, must notify the designated officials immediately.
- Supervisors may in some cases find it necessary to take immediate action to suspend an employee if the employee is involved in personal behavior which seriously endangers the safety of other persons or property.
- If the employee is on any SCACAP premises, a Supervisor should tell the employee to leave the premises at once and either report to his/her immediate supervisor the following day, or remain away until further notice. This directive must be followed by written notification.

- **In extreme emergencies, call law enforcement officials to remove the offending employee.**
- If the employee is not at work, the Supervisor should notify the employee by telephone not to report to work until further notice and provide follow-up of the conversation with written notification.
- Authorities named in this policy will investigate the complaint.
- Upon completion of the investigation, the SCACAP Human Resources Coordinator, in conjunction with management and Legal Counsel, will determine a course of action up to dismissal. Decisions regarding arrest and prosecution will be made in consultation with local law enforcement.

Responsibility

Action

Employee	Immediately notify supervisor of any indication of violence in the workplace. In cases of emergency call 911.
Supervisor	Contact local law enforcement and the SCACAP Human Resources Coordinator.
Human Resources	Investigate the act of violence reported and determine the course of action in conjunction with the SCACAP Legal Counsel.

Training

All employees will be made aware of the provisions of the Workplace Violence Policy. New employees shall be briefed on the policy during orientation.

Procedure Title:	Employee Work Schedule		
Procedure Number:	3.14	Effective Date:	October 1, 2018
Policy Title Reference:	3.14- Employee Work Schedule		
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

The SCACAP is dedicated to providing excellent response and performance to all of its partners and customers. In order to accomplish this, a standard employee work schedule is established. All employees are required to work from 8:30 am, until 5:00 pm each work day of the week.

Exceptions to this schedule require written prior approval from the employee's supervisor. It is the organization's policy to work with employees where possible on flexible scheduling if it meets the needs of the employee, supervisor, and the organizations goals and objectives.

Alternate schedules will be approved in writing by both the employee's supervisor and his/her supervisor prior to implementing any schedule changes. If at any time the approved change in schedule no longer is in the best interest of the employee, or the organization, the alternate schedule will be rescinded. There is no guarantee that an employee will be able to continue in an altered work week, once it is begun.

DEFINITIONS

SCACAP - South Carolina Association of Community Action Partnerships

PROCEDURES

I. HOURS OF WORK:

- A. The minimum full-time workweek shall be 37.5 hours for South Carolina Association of Community Action Partnerships personnel. Employees who work a 37.5-hour workweek may be required to work an additional 2.5 hours per week without additional compensation. The hours of work are scheduled between the hours of 7:30 a.m. to 6:00 p.m. Monday through Friday.
- B. Employees are allowed one (1) rest period (coffee break) in the morning and one (1) in the afternoon. These rest periods are limited to fifteen (15) minute durations. These rest periods are not guaranteed and will depend on the work load.
- C. Lunch periods shall be for 60 minutes and scheduled between 11:00 a.m. and 2:00 p.m. Lunch periods within each office/shop will be scheduled by the appropriate manager so that each division is adequately staffed at all times.

II. ALTERNATIVE WORK SCHEDULE:

- A. The core hours that all employees must be regularly scheduled to work will be from 8:30 a.m. to 5:00 p.m.
- B. The assignment of hours for individual employees or operational units will be at the discretion of the employee's direct supervisor and their supervisor. Final approval on all scheduling is reserved for the Executive Director. Adequate coverage to meet each division's service obligation to the public and agency needs will be considered in approving or disapproving alternative work schedules.
- C. Each appropriate supervisor will assure that adequate supervision is provided at all times to staff as needed.
- D. Each supervisor and/or Agency Director may alter the adopted alternative work schedules for employees as needed.
- E. A 60-minute lunch period will be observed. No portion of the lunch period should be used to make up time for an alternative work schedule except when approved in advance by the appropriate supervisor and Agency Director, as needed, for unusual circumstances. Lunch periods shall not be used to allow an employee to come in late or to leave early.
- F. Alternative Work Schedule Request forms will be completed by the employee and approved by the respective supervisor and their supervisor, with final approval by the Executive Director as needed. The completed forms are retained by the appropriate supervisor and the Human Resource Coordinator.

Procedure Title:	Recruitment and Selection of Employees		
Procedure Number:	3.15	Effective Date:	October 1, 2018
Policy Title Reference:	3.15 - Recruitment and Selection of Employees		
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

The South Carolina Association of Community Action Partnerships is an affirmative action, equal opportunity employer and adheres to all State and Federal laws applicable to employment decisions.

It is the policy of the SCACAP to make all decisions regarding recruitment, hiring, promotion, and all other terms and conditions of employment without regard to race, color, creed, religion, sex, national origin, age, disability, or other factors which cannot lawfully be the basis for an employment decision.

Individuals employed by the SCACAP are agency employees, and as such are subject to the rules and regulations of SCACAP.

Positions within the SCACAP fall into the following three (3) categories:

I. **Permanent** positions are established when there is a projected need for specific duties to be performed continuously for a period of time that exceeds twelve (12) months.

II. **Temporary** positions are established when there is a need to provide specific skills for defined projects, peak workloads, and/or short-term replacement of permanent employees on leave of absence for a period not to exceed twelve (12) months.

III. **Temporary Grant** positions are established when there is a need to provide specific skills for defined projects and the position is funded by federal grants, public charity grants, private foundation grants, research grants, and other such sources authorized by the appropriate state authority. A temporary grant position must be limited to, and cannot exist beyond, the duration of the grant or any subsequent renewals.

All of the above may be established as full-time or part-time positions based on the number of work hours required to perform the assigned duties and the availability of funds.

It is the policy for SCACAP to encourage internal employees to take advantage of opportunities that may exist for future development, promotion, and advancement based on their skills, experience and capabilities. This may include adding additional duties, reclassifications and other organizational changes that meet the organization's needs. Our policy includes finding and developing the best and most qualified person for positions in the organization. The organization will utilize internal candidates where possible.

EHS-CCP Staffing Requirements:

It is the policy of SCACAP to meet all hiring requirements needed according to federal guidelines for the Early Head Start-Child Care Partnership Grant. This includes review and oversight of the EHS-CCP Policy Council and other bodies based on the EHS-CCP Program Standards. Requirements of documentation of other requirements for hiring are specified in the procedures.

PROCEDURE

I. Recruitment and Selection of Employees

A, Establishing and Filling New and Vacant Positions

A position description outlining the job function, specific duties, and the minimum training and experience required to perform the job must be developed by the appropriate Hiring Manager or designee and forwarded along with a SCACAP Personnel Action form to the SCACAP Human Resources Coordinator for review and comment. The Human Resources Coordinator will confirm or recommend a classification to be submitted to the agency director for approval. The Human Resources Coordinator will forward the request to the Finance Director to verify the source and authorize the availability of funds.

When the position is approved, a Request to Post Vacancy form, along with a position description, must be submitted to the SC Department of Education Human Resources department.

B. Recruitment

The recruitment process may begin when an approved Request to Post Vacancy form and a current position description has been submitted. All full-time equivalent (FTE) positions are required to be posted for a minimum of five (5) calendar days to the recruitment website (www.scacap.org).

SCACAP is not required to post vacancies for non-FTE positions, such as temporary grant or time-limited positions; however, the Division of State Human Resources encourages agencies to post any vacant position to maximize its recruitment and selection opportunities.

All applicants are required to complete an original SCACAP Application. An applicant must meet the minimum requirements for a particular job in order to be considered for the position. All parents of Early Head Start - Child Care Partnership children who apply and meet the qualifications for any position will be considered.

C. Interview Process

The Hiring Manager and Human Resources Coordinator will receive copies of all applications. Upon receiving the applications, the Hiring Manager or his/her designee shall organize an interview team of at least two (2) SCACAP employees including a team leader. Each team member will be given equal weight during the interview process however; the Hiring Manager or his/her designee will be considered the team leader. Interview teams shall be diverse in terms of race and sex. Except for extenuating circumstances, interview team members shall remain the same throughout the interview process.

The interview team will evaluate the applications and determine which candidates meet the minimum training and experience requirements. The evaluation shall include a comparison of the application as it relates to the minimum training and experience requirements stated on the announcement of vacancy. If an applicant's qualifications equal or exceed those reflected on the job description, the applicant will be considered qualified for the position and designated for further consideration by the interview team.

Upon further review of the qualified applicants, the interview team will determine who is to be selected for personal interviews. No interviews are to be conducted until all applications have been reviewed by the interview team.

D. Selection

The interview team will conduct interviews and determine which candidates are recommended to fill a vacant position. Standard questions for candidates shall be developed and used for the personal interview process. The committee's recommendations shall include a minimum of three (3) final candidates listed in non-priority order with corresponding strengths and weaknesses which should justify the candidate who best meets the requirements of the position. The hiring manager will make the final decision as to the selected candidate. For all Early Head Start- Child Care Partnership employees, appropriate governance council involvement and approval will be completed prior to hiring. All employees will have documented reference checks prior to hiring.

E. State Law Enforcement Division Reviews

Prior to an applicant being offered employment with SCACAP, a State Law Enforcement Division Review must be conducted. Employment may be offered upon receipt of satisfactory results from the State Law Enforcement Division (SLED).

Any SCACAP potential employee who comes into contact with children will also be required to pass a State Criminal History check with fingerprints, as well as any state they have lived in during the last 5 years, or an FBI Criminal History check with fingerprints. In addition, these potential employees will receive a review in the Child Abuse and Neglect Registry, and the Sex Offender Registry. All SCACAP employees who come into contact with children will be re-evaluated every 5 years.

F. Offers of Employment

All salary offers shall be made in writing to the selected candidate. All candidates must return letters of acceptance to the Human Resources Coordinator.

Unsuccessful candidates must be notified by the office responsible for the hiring once the process is complete.

G. Temporary Staffing Agencies

A temporary staffing agency will be used, upon consultation with the Human Resources Coordinator and Finance Director, when it is determined that use of a temporary staffing agency is more advantageous to the agency.

The requesting office must submit a Purchase Order Requisition to the Office Manager in order to procure funding for the temporary staffing agency.

A temporary employee from a staffing agency will be considered an employee of the staffing agency and wages, insurance, taxes, and benefits are the responsibility of that private agency. No offer of permanent employment may be made to a temporary employee while under contract to a private employment agency.

H. Required Signatures for Personnel Actions

The agency director's signature, or their designee, is required for all personnel actions.

II. Freedom of Information Act Requests

Pursuant to the South Carolina Freedom of Information Act (FOIA) S.C. Code 30-4-10, public bodies must make available to a requestor under the FOIA the total number of applicants who applied for a specific employment position. Second, public bodies must disclose all materials gathered during the employment search for not fewer than the final three (3) applicants under consideration for a position.

All requests for information concerning applicants must be in writing and directed to the Human Resources Coordinator. The Human Resources Coordinator will provide the agency's Director with a copy of the request.

When the agency receives a written request under the FOIA for information concerning an applicant, the Human Resources Coordinator will respond in writing to the request within fifteen (15) days (except Saturdays, Sundays, and legal public holidays).

The Human Resources Coordinator, under consultation with the Agency Director and General Counsel, shall determine which information to disclose under the FOIA request. General Counsel will be consulted in the processing of FOIA requests and in determining whether public disclosure of materials would constitute an unreasonable invasion of personal privacy (S.C. Code 30-4-40 (21)).

III. Appointments, Status, Transfers, Separations, and Personnel Settlements

A. Appointments

1. Appointments shall only be made to positions that have been established and classified in accordance with the provisions of the regulations.
2. An established position shall be filled by one of the following types of appointments: original, promotion, demotion; reassignment; or transfer.
3. Classified employees shall be paid in accordance with the Classified Employee Pay Plan.
4. Upon appointment to an established position, an employee shall be given one (1) of the following types of status: probationary; temporary; permanent; trial; or temporary grant.
5. When a position receives a State class title change without a change in salary band, the incumbent employee shall retain the same status as held under the old class title.
6. An employee shall not attain permanent status in a class until appointed in accordance with the provisions of this section and those other applicable procedures of the SC Division of State Human Resources, and until the employee has completed the required probationary or trial period.
7. Persons with disabilities shall be given equal consideration for appointments to positions for which they are qualified.
8. No person shall be appointed to or separated from a position because of race, sex, age, national origin, religion, disability, political affiliations, or opinions. Discrimination on the basis of age in employment is prohibited except where specified age requirements are stated as a part of the official class specifications.
9. Any person appointed to an established permanent position within SCACAP must meet minimum training and experience requirements established in the specification for the class to which appointed unless the employee is appointed to a trainee status, or the SCACAP Human Resources Director has approved an equivalency to the required training and experience established for the class.

B. Status

1. Upon receiving an original appointment, an employee shall be given status in accordance with the following:
 - A. Probationary Status: An employee appointed to fill an established permanent position on a full-time or part-time basis shall be given probationary status.
 - B. Temporary Status: An employee appointed on a full-time or part-time basis shall be given temporary status when the appointment is to a non-permanent position not to exceed twelve (12) months.
 - C. Permanent Status: An employee appointed with probationary status shall be required to serve a probationary period of twelve (12) months. The probationary period may not be extended. An employee shall not attain permanent status in a class while serving in temporary status.

C. Health Exams

1. All SCACAP employees who come into contact with children will be required to receive a physical and other health screenings as appropriate. This will include screening for tuberculosis. This will be consistent with the requirements of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act.

D. Employee Records

1. Official Employee records are maintained by the SCACAP. This file will be maintained by the Human Resources Coordinator in a secure location at the state office. In all situations, the official record at SCACAP will be considered the actual and complete record for each employee hired by SCACAP.

E. Transfer

1. An employee shall be given a reassignment appointment when moved within SCACAP from one position to another position having the same salary band, or when the employee's position is moved, without requiring reclassification. An employee shall be given a transfer of appointment when moved to a different agency from one position to another position in the same salary band, or when the employee's position is moved from one agency to another agency without requiring reclassification.
2. An employee with permanent status who is given a reassignment or transfer appointment to a different position in the same class shall retain permanent status upon assignment to the new position.

F. Separations

1. Resignation: An employee who resigns should submit their resignation in writing to their direct supervisor or agency director. Resignations should be submitted to provide a minimum of two (2) weeks notice. An employee who resigns may not rescind a resignation unless the agency director agrees to the rescindment.
2. Termination During Probationary Period: An employee who is terminated during the probationary period shall not have the right of appeal in accordance with the State Employee Grievance Act.
3. Termination: For purposes of the Grievance, termination is the action taken by an agency against an employee to separate the employee involuntarily from employment.

G. Reduction in Force

1. SCACAP shall be responsible for the development of a written reduction in force policy for the agency. This reduction in force policy shall be in compliance with the appropriate Division of Human Resources policies and procedures.

H. Personnel Settlements

It is the policy of the State Fiscal Accountability Authority that personnel settlement proposals be presented to the State Fiscal Accountability Authority for approval as outlined in the following:

1. In all situations where a personnel settlement has not been negotiated or approved by the Office of the Attorney General under a plan approved by the Office of the Attorney General;
2. In all human resources-related matters, after review and recommendation by the Human Resources Director, excluding settlements which have been negotiated and approved by the Workers' Compensation Commission, Department of Employment and Workforce, Equal Employment Opportunity Commission, or South Carolina Human Affairs Commission.
3. In all other situations where specific approval of the State Fiscal Accountability Authority would be necessary to disburse funds mentioned under the settlement proposal. Exception: Personnel Settlements containing lump sum amounts where payment would be supplied by the Insurance Reserve Fund or an agency's Foundation Fund.
 - a. All personnel settlement proposals shall contain such information as the designee specifies.
 - b. The Human Resources Director may review and approve any personnel settlement of \$10,000 or less.

4.0 Employee Code of Conduct Table of Contents

4.1a EHS Employee Code of Conduct

Procedure Title	EHS Employee Code of Conduct		
Procedure Number:	4.1 a	Effective Date:	October 21, 2018
Policy Title Reference:	4.1 a - Employee Code of Conduct		
Regulation References:	1302 .90		
Forms:			
SCACAP Executive Director Approval Date:	October 21, 2018	EHSDirector Approval Date: -	October 21, 2018
Revisions Dates:	December 19, 2017		

POLICY

Early Head Start-Child Care Partnership employees will conduct themselves according to the Code of Conduct for SCACAP to School Readiness and will adhere to the Code of Conduct for the Early Head Start Child Care Partnership. Each employee will sign the Early Head Start Child Care Partnership Code of Conduct during their orientation to the program. These signed statements will be included in each employee’s personnel file.

Procedures:

Head Start Code of Conduct

Each employee working in the Early Head Start Program will sign the Early Head Start Child Code of Conduct Statement and it will be filed in the employee’s personnel file. The statement is attached below.

Early Head Start Code of Conduct Statement

As a staff member, contractor, or volunteer within the Early Head Start-Child Care Partnership program, I recognize that it is my duty to adhere to SCACAP's Early Head Start Code of Conduct. The minimum requirements detailed below are set forth in the federal Early Head Start Performance Standards (45 CFR 1302.90) and have, in some cases, been expanded upon by SCACAP to reflect organizational values and expectations. Through my signature below, I acknowledge the following responsibilities:

- 1) I will respect and promote the unique identity of each child and family and refrain from stereotyping on any basis, including gender, race, ethnicity, culture, religion, disability, sexual orientation, gender identity or family composition.
- 2) Maintaining confidentiality is critical to the success of our mission, our reputation in the community, and the privacy of our clients and staff. Family files and client information, personnel records, financial information, and other related information is considered confidential. This is in accordance with subpart C of 45 CFR 1303 as well as other federal, state, and local laws. I am duty-bound to protect this information by safeguarding it when in use, filing it properly when not in use, and discussing it only with those who have a legitimate need to know. Staff members who are also program parents, may not access confidential information (as defined above) other than what is required within the scope of their job responsibilities. If approached by members of the news media, requesting information regarding SCACAP Early Head Start operations, I will refer requests to the SCACAP Early Head Start Director.
- 3) I understand that no child may be left alone or unsupervised while under my care. Supervised is interpreted to mean two paid staff persons, contracted staff persons, or approved volunteers being present.
- 4) I will use positive strategies to support children's well-being and prevent and address challenging behavior. My verbal interactions with both adults and children will be consistently positive, respectful and professional, and my physical contact with enrolled children will be uniformly safe, tender, and caring.
- 5) I will not maltreat or endanger the health or safety of children. I acknowledge that I will never:
 - a) Use physical force or touch as a form of discipline (corporal punishment);
 - 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, humiliate or shame 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 the use of a harsh or disrespectful tone, profane or sarcastic language, threats, or derogatory remarks about the child or child's family;
 - i) Use physical activity or outdoor time as a punishment or reward; or
 - j) Lift any child by his or her extremities (arms/legs).
 - k) Permit a child to remain in a state of undress beyond the diapering/toileting process.
- 6) I understand that I am a mandated reporter of suspected child abuse and neglect under South Carolina law. In the event that I suspect (or witness) the abuse or endangerment of a child, I am legally bound to report this to the SC Department of Social Services. After doing so (in relation to

an enrolled Early Head Start client family), I will immediately report this information to South Carolina Association of Community Action Partnerships.

- 7) I understand that certain types of incidents require immediate reporting to SCACAP so that they can address related issues and timely report on their resolution to the federal Office of Head Start. I will immediately report to SCACAP regarding:
- Any child injury that requires outside medical attention
 - Issues of concern related to the health and safety of program participants
 - A classroom closure (for any reason)
 - The mandated reporting of suspected child abuse/neglect (whether in the home or in the school) to the South Carolina Department of Social Services (DSS)
 - Any incident that involves the participation of lawenforcement officials.
- 8) I understand that no child may be removed from the presence of staff other than by a child's own parent or guardian or other authorized person.
- 9) I will not solicit or accept gratuities, favors, or anything of significant value for personal use or enrichment from contractors/vendors or potential contractors/vendors who have been awarded contracts or provide services or materials for SCACAP Early Head Start.
- 10) Unless explicitly authorized by the SCACAP Early Head Start Director to do so, I will not solicit or request donations (monetary, services and/or goods) for the agency or agency sponsored events.
- 11) I understand that I must maintain professional boundaries with agency enrolled children/families at all times. Staff members are expected to keep their personal lives separate from those of enrolled children/families and shall have only limited contact outside of work time and/or work- related activities. Staff will discuss with their supervisors any situations/relationships with enrolled children/families that are unclear or questionable.
- 12) I understand this document shall be placed in my personnel file and that violations of these codes may result in disciplinary action up to and including termination based on the disciplinary guidelines and policies of Early Head Start Child Care Partnership and SCACAP to School Readiness.
- 13) I understand that that I will follow the ideals, and principles of the NAEYC Ethical Code of Conduct.

Employee _____ Date _____

5.0 Staff Training and Development Table of Contents

- 5.1 Staff Qualifications
- 5.2 Staff Development Approach
- 5.3 Head Start Requirements for Staff

Procedure Title:	Staff Qualifications		
Procedure Number:	5.1	Effective Date:	October 21, 2018
Policy Title Reference:	5.1 - Staff Qualifications		
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 21, 2018	EHS Director Approval Date:	October 21, 2018
Revisions Dates:			

Policy

SCACAP will recruit and select dynamic, well-qualified individuals that demonstrate the knowledge, skills and experience needed to provide high quality, comprehensive, and culturally sensitive services to enrolled children and families.

Definitions

SCACAP: South Carolina Association of Community Action Partnerships

Procedures

South Carolina Association of Community Action Partnerships Early Head Start staff will be held to minimum qualifications established in the Head Start Act and Head Start Performance Standards. All EHS teachers must have an Infant-Toddler CDA, an Associate's Degree or a Bachelor's degree in early childhood education to be qualified as a teacher.

Procedure Title:	Staff Development Approach		
Procedure Number:	5.2	Effective Date,	October 21, 2018
Policy Title Reference:	5.2-Staff Development Approach		
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 21, 2018	EHS Director Approval Date:	October 21, 2018
Revisions Dates;			

Policy

Program staff will be provided with continuous learning opportunities that meet the changing needs of the children and families served, and that ensure the existence of a well-trained, qualified staff in the classroom, in support positions, and on a management level.

Definitions

SCACAP: South Carolina Association of Community Action Partnerships

PROCEDURES

Annual training priorities will be determined as follows:

1. First priority will be to correct program or individual weaknesses or deficiencies as indicated by:
 - o Program Self-Assessment;
 - o In-depth state and/or federal monitoring reviews; and
 - o Individual training based on the results of performance appraisal.
2. Second priority will be given to identified changes in service area or program requirements:
 - a. Changes in EHS focus or requirements;
 - b. Observed changes in families and children requiring additional or increased skills and knowledge on the part of staff, volunteers and consultants; and
3. Third priority will be to provide employees with individual training based on:
 - o Individual requests for training to increase skill and knowledge in a particular area; and
 - o Program requests that individuals attend specific training sessions to bring back information, or to help meet long-term program goals.

Training Plans will be developed in committee with participation from EHS management staff, direct service staff, and Policy Council Representatives, and will include:

1. For all teaching staff: methods for identifying and reporting child abuse and neglect; blood-borne pathogen training; and CACFP training;

2. For all teaching staff: First Aid/CPR training;
3. Specific training topics as identified;
4. Training and coursework necessary for obtaining certification, degree, or coursework needed to meet EHS teacher qualifications; and
5. Participation in conferences and workshops as available, and as funding allows.

Staff will have the opportunity to request additional training to meet individual goals, to strengthen skills or to enhance areas of specialization.

Academic credit will be encouraged with the goal of having all teaching staff with an Associates or Bachelor' s degree in Early Childhood Education, or a related degree with certification courses in Early Childhood Education.

Mentoring relationships will be encouraged among staff members and within the community in order to fully utilize the skills, knowledge and talent within the program and within the community.

Procedure Title:	Head start Requirements for Staff		
Procedure Number:	5.3	Effective Date:	October 1, 2018
Policy Title Reference:	5.3 - Head Start Requirements for Staff		
Regulation References:	45 CFR 1302.91		
Forms,			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP will ensure that all program staff will meet minimum qualifications established within the federal **HSPPS**.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

HSPPS: Head Start Program Performance Standards

REFERENCED PROCEDURES

1302.91(a) Grantee agencies must ensure that staff and consultants have the knowledge, skills, and experience they need to perform their assigned functions responsibly.

In addition, grantee agencies must ensure that only candidates with the qualifications specified in this part are hired.

Staff and program consultants must be familiar with the ethnic background and heritage of families in the program and must be able to serve and effectively communicate, to the extent feasible, with children and families with no or limited English proficiency.

1302.91(b) **EARLY HEAD START DIRECTOR QUALIFICATIONS:** The Early Head Start director must have demonstrated skills and abilities in a management capacity relevant to human services program management.

Rationale: Leadership and management skills and abilities are essential to overseeing the staff and operations of a comprehensive, quality child and family program.

Guidance: To ensure that an appropriately qualified director is employed, agencies require that the director possess the following attributes:

- leadership ability,
- good interpersonal and communication skills, including the ability to work as part of a team, communicate effectively both orally and in writing, receive and provide feedback, and manage dynamic interchanges in meetings,
- the ability to develop and manage a budget,
- experience in human services program management, including program planning, operations and evaluation, and the use of management information systems, and
- an understanding of the Early Head Start philosophy and the ability to implement its principle of shared authority and decision-making.

1302.91(c) **QUALIFIED FISCAL OFFICER:** Grantee agencies must secure the regularly scheduled or ongoing services of a qualified fiscal officer.

Guidance: To ensure that an appropriately qualified fiscal officer is available, agencies employ staff or consultants with specific abilities, such as to:

- Develop, monitor, evaluate, and report on financial control programs and procedures, including compensation and benefits to policy groups and staff;

- Develop and maintain accurate charts of accounts, including the allocation of program income and outlays and In-kind contributions;
- Initiate and direct, in coordination with other staff and parents, cost studies and comparative analyses of alternative operating strategies; and
- Assist in the resolution of audit exceptions and the implementation of auditors' recommendations and report all findings to management staff and governing bodies.

Note: Qualified fiscal officers include Certified Public Accountants (CPAs), persons holding a bachelor's or master's degree in accounting, and others with demonstrated expertise in fiscal matters. They may be hired directly as Early Head Start staff, be provided by the grantee agency as part of the indirect cost pool, or work under contract on a regularly scheduled basis.

1302.91 (d) (1-2) QUALIFICATIONS OF CONTENT AREA EXPERTS: Grantee agencies must hire staff or consultants who meet the qualifications listed below to provide content area expertise and oversight on an ongoing or regularly scheduled basis. Agencies must determine the appropriate staffing pattern necessary to provide these functions.

EDUCATION AND CHILD DEVELOPMENT SERVICES must be supported by staff or consultants with training and experience in areas that include the theories and principles of child growth and development, early childhood education, and family support.

Section 648A (a)(2)(B). not later than September 30, 2013, all

(i) Early Head Start education coordinators, including those that serve as curriculum specialists, nationwide in center-based programs

(I) have the capacity to offer assistance to other teachers in the implementation and adaptation of curricula to the group and individual needs of children in an Early Head Start classroom; and

(II) have

(aa) a baccalaureate or advanced degree in early childhood education; or

(bb) a baccalaureate or advanced degree and coursework equivalent to a major relating to early childhood education, with experience teaching preschool-age children.

Specific Abilities:

- Guide the planning and implementation of a comprehensive child development program that meets the Early Head Start definition of curriculum in all program options and settings;
- Put into practice theories and sound principles of child and adult education; and
- Embrace the role of the parent as the primary educator of the child and promote and support attachment between parent and child.

1302.91 (d) (1) HEALTH SERVICES must be supported by staff or consultants with training and experience in public health, nursing, health education, maternal and child health or health administration.

Specific Abilities: Link families with an ongoing system of health care, assist parents in the selection of health providers, counsel them about child or family health problems, and promote parent involvement in all aspects of the health program;

- Negotiate with the Health Services Advisory Committee and local health care professionals and service providers to ensure that services for families are available and accessible;
- Review, evaluate, and interpret health records and other vital health service data; and
- Promote health and safety practices in the program and coordinate safety and sanitation procedures, first aid, and emergency medical procedures.
- In addition, when a health procedure must be performed only by a licensed/certified health professional, the agency must assure that the requirement is followed.

1302.91 (e) (8) (Iii) NUTRITION SERVICES must be supported by staff or consultants who are registered dietitians or nutritionists.

Specific Abilities:

- Experience in menu planning, including the quantity, quality, and variety of food to be purchased;
- The abilities to interpret nutrition assessment data, provide nutrition counseling for families, in other ways promote good nutrition habits among children and families; and
- Expertise to assist staff in dealing with children with feeding problems or special nutritional needs.

Note: Agencies that directly provide nutrition services ensure that the employee responsible for those services or the nutrition consultant who supports this staff member possesses a current registration with the Commission on Dietetic Registration of the American Dietetic Association or be eligible, registered, and ready to take the examination. A master's degree (MPH or MS) from an approved program in public health nutrition may be substituted for this registration. Agencies that contract for nutrition services ensure that staff in the agency with which they have contracted possess the necessary qualifications.

1302.91(8) (ii) MENTAL HEALTH SERVICES must be supported by staff or consultants who are licensed or certified mental health professionals with experience and expertise in serving young children and families.

Specific Abilities:

- Knowledge of treatment strategies in the areas of child behavior management and family crisis intervention;
- The ability to work with families in a supportive manner throughout the diagnostic and referral processes;
- The ability to work with staff to improve their own health and they, in turn, provide supportive services to families; and
- The ability to broker the services or to provide counseling and treatment for children and families with diagnosed problems.
- In addition, agencies need to ensure that mental health staff and consultants have appropriate license(s) or certification(s).

1302.91 (7) FAMILY AND COMMUNITY PARTNERSHIP SERVICES must be supported by staff or consultants with training and experience in field(s) related to social, human, or family services.

Specific Abilities:

- Develop referral systems and procedures and coordinate social service referrals and follow-up;
- Provide on-site consultation to family and community partnership staff;
- Oversee transition services; and
- Conduct advocacy work.

PARENT INVOLVEMENT SERVICES must be supported by staff or consultants with training, experience, and skills in assisting the parents of young children in advocating and decision-making for their families.

Specific Abilities:

- Oversee the recruiting, training and scheduling of parent volunteers;
- Work with Policy Council and serve as a resource for the Parent Committees;
- Assist parents in developing and scheduling their own social and developmental activities and encourage and support parents in addressing community needs; and
- Keep other agency staff apprised of parent issues, and assist staff in designing and implementing a comprehensive, well-integrated plan for parent involvement that crosses all service areas.

1302.91 (d) (1) DISABILITY SERVICES must be supported by staff or consultants with training and experience in securing and individualizing needed services for children with disabilities.

The grantee must ensure that the health coordinator works closely with Part C providers in the assessment process and follow up to assure that the special needs of each child with disabilities are met.

The grantee must ensure coordination between the health coordinator and the staff person responsible for the mental health component to help teachers identify children who show signs of problems such as possible serious depression, withdrawal, anxiety or abuse.

In the IFSP process, the team will ideally include: the Early Head Start health coordinator or a representative who is qualified to provide or supervise the provision of special education services: The health coordinator must work with staff to ensure that provisions to meet special needs are incorporated into the nutrition program.

Specific Abilities:

- Coordinate the process of assessing children, including initial screenings, ongoing developmental, and specialized assessments, to determine if a disability exists;
- Work with an interdisciplinary team of staff and parents to implement an Individualized Family Service Plan for each child with disabilities;
- Consult regularly with parents and staff on the progress of disabilities services and of the children with disabilities who are enrolled;
- Work closely with local school districts to ensure the coordination of services; and
- Advocate in the community for appropriate services for children with disabilities and their families.
- In addition, agencies ensure that disabilities staff have a thorough understanding of Federal laws governing services to children with disabilities.

Section 648A STAFF QUALIFICATIONS [42 U.S.C.9843a]

(a) CLASSROOM TEACHERS

(1) Professional Requirements - Each Early Head Start classroom in a center-based program is assigned two teachers who have demonstrated competency to perform functions that include:

(A) planning and implementing learning experiences that advance the intellectual and physical development of children, including improving the readiness of children for school by developing their literacy, phonemic, and print awareness, their understanding and use of language, their understanding and use of increasingly complex and varied vocabulary, their appreciation of books, the or understanding of early math and early science, their problem-solving abilities, and their approaches to learning;

(B) establishing and maintaining a safe, healthy learning environment;

(C) supporting the social and emotional development of children; and

(D) encouraging the involvement of the families of the children in an Early Head Start program and supporting the development of relationships between children and their families.

(2) EHS Teacher Qualifications -

(A) Early Head Start Teachers must have a minimum of a current Infant Toddler Child Development Associates (CDA) certificate. In the state of South Carolina's Early Childhood Career Ladder, this CDA is exceeded by a **BA** degree in Early Childhood Education (ECE) or by a 27-hour coursework ECE Credential issued by a State Technical College.

6.0 ERSEA- Eligibility, Recruitment, Selection, Enrollment and Attendance

- 6.1 Definitions (ERSEA)
- 6.2 Eligibility
- 6.3 Recruitment
- 6.4 Selection
- 6.5 Enrollment
- 6.6 Attendance

Procedure Title:	Definitions (ERSEA)		
Procedure Number	6.1	Effective Date:	October 21,2018
Policy Title Reference:	Definitions (ERSEA)		
Regulation References:	45 CFR 1305.2		
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 21, 2018
Revisions Dates:			

POLICY

If fulfilling its ERSEA responsibilities, SCACAP will recognize specific terms as defined by the Office of Head Start in accordance with 45 CFR 1305.2.

DEFINITIONS

ERSEA: Eligibility-Recruitment-Selection-Enrollment-Attendance

PROCEDURE

The following terms are defined in Head Start Performance Standards as they relate to ERSEA:

- (a) **Children with disabilities** means children with mental retardation, hearing impairments including deafness, speech or language impairment, visual impairments including blindness, serious emotional disturbance, orthopedic impairments, autism, traumatic brain injury, other health impairments or specific learning disabilities who, by reason thereof, need special education and related services. The term "children with disabilities" for children aged 0 to 5, inclusive, may, at a State's discretion, include children experiencing developmental delays, as defined by the State, and as measured by appropriate diagnostic instruments and procedures, in one or more of the following areas; physical development, cognitive development, communication development, social or emotional development, or adaptive development; and who, by reason thereof, need special education and related services. (Children with disabilities **MUST** have an IFSP to be counted in the number of disability children served by the program).
- (b) **Enrollment** means the official acceptance of a family by an Early Head Start program and the completion of all procedures necessary for a child and family to begin receiving services.
- (c) **Enrollment opportunities** mean vacancies that exist at the beginning of the enrollment year, or during the program year because of children who leave the program that must be filled for a program to achieve and maintain its funded enrollment (filled within 30 days).
- (d) **Enrollment year** means the period of time, not to exceed twelve months, during which a Head Start program provides center-based services to a group of children and their families.
- (e) **Family** means all persons living in the same household who are:
 1. Supported by the income of the parent(s) or guardian(s) of the child enrolling in or participating in the program
 2. Related to the parent(s) or guardian(s) by blood, marriage, or adoption.
- (f) **Funded enrollment** means the number of children which the Head Start grantee is to serve, as indicated on the grant award. SCACAP is funded to serve 254 infants and toddlers.

- (g) Head Start eligible** means a child that meets the requirements for age and family income as established in program and federal guidelines that meet the requirements of section 645(a) (2) of the Head Start Act. Up to 10% of the children enrolled may be from families that exceed the low-income guidelines.
- (h) Early Head Start program** means a Head Start grantee.
- (i) Income** means gross cash income and includes earned income, military income (including pay and allowances), veteran's benefits, Social Security benefits, unemployment compensation, and public assistance benefits additional examples of gross incomes are listed in the definition of "income" which appears in U.S. Bureau of the Census, Current Population Reports, Series P-60-185.
- (j) Income guidelines** means the official poverty line specified in section 652 of the Head Start Act.
- (k) Low income family** means a family whose total annual income before taxes is equal to, or less than, the income guidelines. For the purpose of eligibility, a child from a family that is receiving public assistance or a child in foster care is eligible even when the family income exceeds the income guidelines.
- (l) Migrant family** means, for purposes of Head Start eligibility, a family with children under the age of compulsory school attendance, who changes their residence by moving from one geographic location to another, either intrastate or interstate, within the preceding two years for the purpose of engaging in agricultural work that involves the production and harvesting of tree and field crops and whose family income comes primarily from this activity.
- (m) Recruitment area** means that geographic locality within which a Head Start program seeks to enroll Head Start children and families. The recruitment area can be the same as the service area or it can be a smaller area within the service area.
- (n) Selection** means the systematic process used to review all applications for Head Start services and to identify those children and families that are to be enrolled in the program.
- (p) Service area** means the geographic area identified in an approved grant application within which a grantee may provide Head Start services.
- (q) Vacancy** means an unfilled enrollment opportunity for a child and family in the Head Start program.

Procedure Title	Eligibility		
Procedure Number	6.2	Effective Date:	October 1, 2018
Sub Procedures	Over Income Homelessness		
Policy Title Reference;	Eligibility - Age/Income Verification		
Regulation References:	45 CFR 130 2.12 (a-m)		
Forms:	Income Determination Form Eligibility Verification Form Homeless Verification Form		
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

Early Head Start accepts children according to Federal age/income eligibility criteria.

DEFINITIONS

N/A

PROCEDURE

Overview:

At least ninety percent (90%) of enrolled children will be from those determined to be income or categorically eligible. For the purpose of eligibility, children will be considered categorically eligible and thus income-eligible if the family is:

1. Receiving assistance through Temporary Assistance to Needy Families (TANF), Social Security Income (SSI), and Supplemental Nutrition Assistance Program (SNAP).
2. If the child is in foster care
3. The family is homeless as defined in the McKinney-Vento Homeless Assistance Improvements Act of 2001.

At least 25 percent of children will receive childcare subsidies through the SC Voucher program.

As allowed by the Federal Head Start Act, homeless children will be allowed to attend EHS classrooms without immunization records and reasonable time will be given for homeless families to collect these and any other required documents.

In communities where there are no children on the waiting list who qualify based on categorical eligibility or federal poverty level, children with a family income of 130% of federal poverty level may be enrolled. Enrollment at the 130% of federal poverty level is limited to 35% of total program enrollment. However, in the instance that children at 130% of federal poverty level are enrolled into a center in which no other age or income eligible children are on the waiting list, these families will be considered to be income-eligible. Ten percent of enrolled children may be from families who exceed the low-income guidelines, but who meet the criteria for selection and would benefit from EHS services.

Procedure:

1. The Child Plus application process will be used to document family information. Enrollment of child/family from wait lists follows Federal and Agency enrollment requirements.
2. Priority is given to 0- 36 month old children from the neediest families in Early Head Start.
3. Enrollment policies are reviewed and updated annually to refocus enrollment according to community needs and federal requirements.

4. The Community Assessment is used to determine the appropriate enrollment of children to best reflect the demographics of the community.
5. The agency monitors all of the above activities.
6. Up to ten percent of the children may be from over-income families who meet the selection criteria and who could benefit from Head Start services. An additional 35 percent of families can be within 101-130 percent.
7. An application is received according to the following procedures:
 1. The Family Advocate processes the initial application and processes the initial application file. A signed statement regarding documents reviewed by staff will be in each child's application file.
 2. Verify attachments and keep with the application:
 1. Verify the size of the family.
 2. Families who receive TANF benefits, Supplemental Security Income, **SNAP**, are enrolling a foster child, or who are currently homeless, will be categorically eligible.
 3. Income verification for the last twelve (12) months or prior calendar year. Income will be established using current poverty guidelines, individual income tax form 1040, public assistance information, W-2 forms, pay stubs, written statement from employers, or documentation showing current status of recipients of public assistance. If the family asserts that there is no income in the home, a Verification of Support/ "0" Income Affidavit will be completed.
 4. Birth date will be verified by birth certificate, medical card, immunization record or hospital verification.
 5. Immunization status is verified by the South Carolina Certificate of Immunization.
 6. Information from BabyNet will be used to verify disability information.
8. Application information will be entered into the Child Plus database by the Family Advocate. In addition, a file folder for each child's application will be set up.
9. A waiting list report will be generated from the Child Plus database, listing children's names and the priority points assigned to each child.
10. When an enrollment slot becomes available, the Family Service Coordinator will review the Child Plus waiting list to determine which child is next on the waiting list by priority points.
11. The Family Service Coordinator will then transfer the child's application file into the appropriate Family Advocate's caseload. The Family Advocate will contact the family and complete the remaining paperwork to verify if there is any medical or dietary needs the child has before entering the program.
12. Once the child begins and is physically present in the classroom, the Family Advocate will complete a Change of Status Form to reflect the child's first day of enrollment. A copy of the form will be given to the Family Service Coordinator for tracking and for changing the child's status in the Child Plus database. A second copy of the form will be given to the Education Coordinator.
13. Application processing staff will receive annual training to ensure that those employees are fully aware of the consequences established by the grantee for employees who knowingly sign a verification form that contains false information.

Over Income:

Over income children will be placed on the waiting list following any income-eligible children, and considered only if no income-eligible children are already on the waiting list. Over income families that fall within 101% - 130% of the poverty guidelines will be prioritized ahead of families who fall within 131%-250% of the poverty guideline.

1. Before enrolling children according to the above stated guidelines, EHS will demonstrate that they have met the needs of the low-income population and annually report to the Office of Head Start.
2. EHS will demonstrate that the needs of the low-income population have been met by on-going reporting of recruitment efforts. Family Advocates will complete recruitment reports on an ongoing basis. Reports will be submitted to the Family Service Coordinator.

3. The EHS program bases its recruitment efforts on the findings of the Community Assessment, and on the Census Poverty Statistic.
4. The Family Service Coordinator in consultation with the EHS Director and the management team will decide if the needs of the low-income population have been met before serving up to 35% of the program's enrollment with children whose family incomes are between 100-130% above the poverty level.
5. The use of 35% of the slots for over income children whose family incomes are in the 100-130% above the poverty level range will be a last resort of the program to avoid being under enrolled. The SCACAP EHS program will make every effort to serve as many low-income families as possible.
6. In addition, children whose family income is above 130% of poverty may be accepted as a part of the 10% over-income.
7. Families with priority issues such as homelessness and children with diagnosed disabilities, whose income falls above 100%, will be given top priority despite their income, with the low-income families with children with disabilities being given priority over the 100-130% of families with children with diagnosed disabilities.

McKinney-Vento Homeless Assistance Act:

The Early Head Start Program will provide homeless families with enrollment opportunities, even when a family does not have the documentation usually required for enrollment, such as proof of guardianship, a birth certificate, immunization, or other health records, and proof of residence.

1. A child applying to the program that is homeless, in accordance with the definition of homeless provided in the McKinney-Vento Homeless Assistance Act, will receive top enrollment priority. They will be enrolled immediately, at the first available vacancy, regardless of program enrollment requirements. A plan must be developed with each individual family to secure all enrollment requirements within specified timelines agreed upon by both program staff and the enrolling child's family.
2. The McKinney-Vento Homeless Assistance Act defines homelessness as:
The term "homeless children and youth" -means individuals who lack a fixed regular, and adequate night time residence...; and includes:
 - a. children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason and have no income that contributes to the benefit of that family; are living in hotels, motels, trailer parks, or camping grounds due to the lack of alternative accommodations; are living in emergency or transitional shelters; are abandoned in hospitals; or are awaiting foster care placement
 - b. children and youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings
 - c. children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing
 - d. migratory children who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (o)
3. Homeless verification can be handled in such a way that it does not violate privacy or jeopardize housing arrangements. It is up to the local liaison, enrollment staff, and/or other school personnel to be sensitive and discreet. In summary, the program's attempt to verify a student's eligibility for McKinney-Vento services must be governed by respect, sensitivity, and reasonable limits. When in doubt, the SCACAP Early Head Start program will always enroll the student and should seek support from local or state homeless resources.

4. The Early Head Start program;
 - a. Will not threaten or harass parents or students, violate their privacy, or jeopardize their housing
 - b. Will not contact landlords or housing agencies about a student or family-Such contacts may violate the Family Educational Rights and privacy Act(FERPA) and the McKinney Vento Act and may jeopardize already tenuous housing situations. In addition, these contacts generally do not provide useful information.
 - c. Will not conduct invasive surveillance of families, such as following them, observing them from outside their residences, or talking to neighbors about their living situation. The McKinney-Vento Act requires programs to eliminate barriers to enrollment and attendance; acts that may threaten or intimidate create barriers that can frighten parents and students away from the program. EHS staff trained on issues of homelessness and the McKinney-Vento Act can conduct respectful home visits when necessary,
 - d. Will not pose barriers to enrollment
 - e. **Will** not require documents like eviction notices, utility bills, occupancy permits, or notarized letters from host families. The McKinney-Vento Act prohibits programs from requiring documents for enrollment.
 - f. Will not force caregivers to obtain legal custody or guardianship to enroll youth. The McKinney-Vento Act requires programs to have procedures to enroll unaccompanied youth immediately; legal custody or guardianship will not be prerequisites.
 - g. Will not force people into shelters or onto the streets as a prerequisite for McKinney -Vento services.

Early Head Start Procedures for Identifying and Serving Homeless Families

- i If a homeless family is referred from Salvation Army, DSS, Homeless Liaison, etc., they are categorically eligible immediately according to the priority points eligibility grid and any vacant enrollment slots will be filled with these children first. No further referrals to these community agencies will be necessary in order to prevent duplication of services. Mental Health referrals, etc. may still be utilized to serve these families.
- ii Any other families applying for EHS program services that have not been referred from a community agency that has already been identified as homeless will be processed according to the following procedures:
 - 1 At intake when the application for enrollment is being completed, and the family identifies themselves as homeless in the intake process, or completes a McKinney Vento form in a way that indicates the family could be homeless, the **Family Service Coordinator** will be notified so that the family situation can be reviewed.
 - 2 Families that are doubled up with another family will be considered homeless UNLESS the family is working or receiving income to support the household, or for the mutual benefit of that family.
 - 3 Young parents who continue to live at home and have not ever lived elsewhere as a rent-paying tenant are not considered homeless.
 - 4 If the family is potentially identified as qualifying for homeless status, EHS will then need to accept them as homeless. Before they are enrolled in the program the assigned Family Advocate must make a home visit to determine the family's living situation.
 - 5 If a family is determined ineligible to receive homeless status, the child's eligibility points will be adjusted accordingly and they will be reassigned to the waitlist if their remaining priority points do not allow them immediate placement in the program compared to other waitlisted children's points.

Procedure Title:	Recruitment		
Procedure Number:	6.3	Effective Date:	October 1, 2018
Policy Title Reference:	Recruitment		
Regulation References:	45 CFR 1302 .13		
Forms:	Recruitment Logs Recruitment Flyers Recruitment Checklist		
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP EHS actively recruits eligible children and families within its federally-defined service area. SCACAP will develop a recruitment plan each year to systematically identify families whose children may be eligible for EHS services, inform them of services, and encourage them to apply for enrollment into the program.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships to School Readiness
EHS: Early Head Start

PROCEDURE

1. The EHS ERSEA Manager will develop the annual recruitment plan, outlining specific tasks, responsibilities and duties.
2. The recruitment action plan is reviewed annually by the management team and the EHS Policy Council.
3. Recruitment activities will encompass the entire service area of 12 Counties Dillon, Lexington, Saluda, Berkeley, Georgetown, Allendale, York, Anderson, Newberry, Bamberg, Laurens, and Orangeburg and will include:
 - a. press releases
 - b. surveys
 - c. door-to-door canvassing
 - d. contracting with other agencies who may provide referrals
 - e. distribution of flyers
 - f. distribution of posters
 - g. personal contacts
 - h. setting up tables of information
 - i. community involvement
 - j. EHS-CCP Outdoor Signs
4. EHS parents are requested to inform relatives and friends with eligible children about program recruitment.
5. Applications will be made available at a variety of locations to ensure that interested persons have ready access and agencies can readily refer clients to the program.
6. Announcements are posted in community and local service buildings, businesses, churches, and local newspapers. Community and public service announcements (PSA) are arranged with radio and television stations.

7. Recruitment information will be available in Spanish. Translators will translate materials as needed and provide assistance to families during the recruitment process.
8. The recruitment effort includes recruiting children who have severe disabilities, including children who have been previously identified as having disabilities. Ten percent of enrollment opportunities will be made available to children with disabilities. Twenty-five percent of enrollment opportunities will be available to children with SC vouchers.
9. Early Head Start staff will participate in community events to promote and provide information about the program.
10. Recruitment for Early Head Start children and families will take place as needed during the program year to maintain funded enrollment. The initial recruitment and planning process for the upcoming program year is January-April.
11. All staff is responsible for recruiting eligible children and families in continued efforts to promote the program. Staff will recruit in target areas based on the Community Assessment and local community agency information.
12. All recruitment documentation will be kept on file in the EHS Office. A detailed list of where recruitment was done, information left at sites, and the date and person completing the recruitment effort will be maintained by the ERSEA Manager.

SUB - PROCEDURE

1. The Community Assessment will be updated annually to reflect changes in communities within the service area and to ensure that enrollment opportunities will be available where the need is the greatest.
2. Families living and working in the recruitment areas will be informed of the availability of EHS services by posted information in community areas and at local businesses.
3. The EHS program brochure will be periodically updated and made available to interested parents, referral agencies and organizations.
4. Public Recruitment announcements will be made through: newspaper articles and advertisements; local radio station announcements and interviews; public service announcements on local television channels; and recruitment posters.
5. EHS staff will visit local agencies and organizations to describe the EHS CCP program and leave recruitment materials. Staff will target Education Service Districts; Social Service Agencies; Mental Health and Parenting Organizations; County Health Departments; Local Doctors and Dentists; Local School Districts, Preschools and Day Care Facilities; Fraternal and Service Organizations.
6. Referrals will be requested from public and private service providers and families currently enrolled in the local Head Start programs who may have eligible infant/toddlers.
7. Staff recruiters will interview prospective families to collect the initial family data to be considered in the selection process.

Procedure Title:	Selection		
Procedure Number	6.4	Effective Date:	October 1, 2018
Sub Procedures	Selection Application process		
Policy Title Reference:	Selection		
Regulation References:	45 CFR 1302.14 (a-c)		
Forms:	Selection Criteria		
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates,			

POLICY

SCACAP will establish and annually review the program selection criteria. Informed by the Community Assessment, the selection criteria will consider all applicants based on the needs of their families and will include the age of the child, and the extent to which his/her family meets the criteria established. Children with the higher needs will be accepted for enrollment. Ten percent of enrollment opportunities each year will be made available to children with disabilities.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

PROCEDURE

Overview:

The program staff member will complete the Child Plus Application for each family. Families can only receive points for criteria which are documented and verified.

1. **Income Status:** Families applying for Early Head Start will receive points based on the family percentage below or above the National Poverty guidelines.
2. **Age Status:** Children who are younger are given priority points for enrollment.
3. **Disability Status:** Children with a diagnosed disability and a current IFSP will receive priority over a child who has a suspected disability. Once a child is accepted, if a child has a diagnosed disability or the child's parent has suspected that their child has a disability the family will be referred to the Health Manager. The Health Manager will document the child's disability status in Child Plus, and open a disability file for the child. All documentation in the child's file will be kept in a locked cabinet per program policy.

Priority points are also given to families who are categorically eligible, receiving SC vouchers, working and/ or in school.

Procedure:

1. During intake, EHS staff members will complete application forms by interviewing the parents. Documentation of income, TANF, **SSI, SNAP**, foster child status, child's date of birth, child's disability, and child's immunization records will be filed with the application.
2. An application will be processed when documentation is complete, and filed with the application.
3. Application information will be entered in the Child Plus system by the Family Advocate.

4. Priority lists of eligible children with completed applications will be ranked by need. The Child Plus system will be used to generate a waiting list. Children in greatest need will be ranked by points, with the larger number of points indicating greater need.
5. At least 10% of the enrollment slots will be made available for children with disabilities who are determined to be eligible for special education and related services, or early intervention services, as appropriate, as determined under the Individuals with Disabilities Act (IDEA).
6. Enrollment slots will be filled up to 100% according to the ranking based on need on the priority list.
7. Parents will be notified of enrollment opportunities.
8. As vacancies occur during the year, enrollment slots will be filled from the priority list within 30 days of the enrollment vacancy.
9. The ERSEA Manager will fill a vacancy immediately using the priority waiting list. Family Advocates will review the application of the child next on the waiting list. After the supporting documentation is checked, the selected family is contacted. The date the EHS family receives services, or leaves a child in the center is the enrollment date to be entered on the application and in Child Plus.
10. Applications are accepted year around, but a concentrated recruitment effort takes place between February and June.

Procedure Title:	Enrollment		
Procedure Number:	6.5	Effective Date:	October 1, 2018
Sub Procedures	Enrollment Fees		
Policy Reference:	Enrollment		
Regulation References:	45 CFR 1302.15 (a-f)		
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP will maintain an enrollment level of not less than the enrollment level funded by the grant award with no more than thirty (30) calendar days elapsing before a program vacancy is filled.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

PROCEDURE

1. In EHS, the transition process to the appropriate placement will begin six months prior to child's third birthday (see EHS Transition policy).
2. After the request for enrollment has been processed, children may be accepted to the appropriate classroom from the wait list according to the following time lines.

June to August:

- Contact families.
- Confirm classroom preference and interest in **program**.
- Discuss any possible health concerns.
- Discuss any possible special needs for the child.
- Schedule intake appointment.
- Complete intake process.

Beginning in August

- Enrollment of 100 percent of eligible families.

FOR NEW ENROLLEES (as above): Contact families. Confirm classroom preference and interest in program. Schedule intake appointment. Complete Intake process.

FOR RETURNING CHILDREN: Contact re-enrollees to verify continued enrollment. Update any pertinent information.

After program start-up, vacant enrollment slots will be filled as soon as possible, not to exceed 30 days.

- The ERSEA Manager will determine the child who is next on the waiting list, and the appropriate Family Advocate will contact the family by phone to see if they would like to accept the vacant slot.

- In cases where several attempts to reach a family have not been successful, a letter requesting contact will be sent. If there is still no contact with family, enrollment staff will contact the next family on the wait list.

Transfers:

Families who withdraw from the program **and** reapply will not be considered transfers.

Withdrawn status:

If there are attendance concerns, the Family Advocate and classroom staff will attempt to solve it. If the attendance problem is not resolved the ERSEA Manager will contact the family to work toward a solution. If placement is terminated, a letter from the EHS Director will be sent to the family. (See [Attendance Policy 6.6](#))

Once a child has withdrawn from the program, whether by parental request or for another reason, the Family Advocate will complete a change of status form. Copies of this form will be submitted to the ERSEA Manager, The Education Manager and the Health Manager. The child's file will be placed in storage. Documentation will be entered into Child Plus.

When families withdraw from the program for two or more months and return requesting to be enrolled again they must go through the eligibility process again.

The first day a child sits in his/her classroom is considered to be the child's entry date.

Once the program year begins, the child must be seated in the classroom within 10 school days. If the child does not attend school within the 10-day timeframe, and no contact can be made with the family, the child is considered abandoned and will be replaced by another child on the waitlist.

Enrollment Fees:

In accordance with 45 CFR 1302.18, the SCACAP Early Head Start Program does not prescribe any fee schedule or otherwise provide for the charging of any fees for participation in program services.

Under no circumstances will the Early Head Start Program require any fees as a basis for enrollment or participation except for the SC Voucher copay that is given to the center.

The Early Head Start Program provides rest cots or cribs for all children and formula as well as diapers for children who need them.

All program services and classroom supplies for children are provided to children at no cost to families.

Procedure Title:	Attendance		
Procedure Number:	6.6	Effective Date:	October 1, 2018
Policy Title Reference:	Attendance		
Regulations References:	45 CFR 1302.16 (a-c)		
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

All families are encouraged to maintain regular attendance and participation. EHS staff will support families in identifying barriers to regular attendance and will initiate supports as appropriate. If families are not able or willing to participate, another child will be given the opportunity to attend the program.

DEFINITIONS

EHS: Early Head Start

PROCEDURE

Children are best able to benefit from their EHS experience if they attend school on a regular basis. EHS staff will regularly discuss the importance of attendance with parents and encourage their cooperation in bringing their children to school on a regular basis. If children are absent without parent contact for 10 consecutive days, that enrollment slot may be opened up for another eligible applicant. SCACAP EHS-CCP makes every effort to maintain a monthly average daily attendance rate of **85%**.

1. The ERSEA Manager is responsible for investigating and documenting the causes of absenteeism if the average daily attendance in a center-based classroom falls below 85%.
2. The classroom staff is responsible for ensuring that the Daily Sign In/Out forms are completed accurately and completely.
3. The Center Director/classroom staff are responsible for entering information from the Daily Sign In/Out forms in the Child Plus attendance system by 10AM every morning.
4. The classroom staff and Family Advocates are responsible for follow up and family support on attendance issues and for documenting these activities.
5. Parents are encouraged to call or send a note to account for each day that their child cannot attend class and to explain the reasons for the absence. Attendance will be recorded daily in the classroom and entered into Child Plus each day.

8.0 Child Abuse and Neglect

8.1 Child Abuse and Neglect

8.2 Incident Reporting

Procedure Title:	Child Abuse and Neglect		
Procedure Number:	8.1	Effective Date:	October 1, 2018
Policy Title Reference:	Child Abuse and Neglect		
Regulation References:	45 CFR 1302.90 (1) (ii); 1302.92 (b) (2)		
Forms:	III		
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Date:			
Revisions Dates:	December 15, 2017		

POLICY

All EHS employees who are working directly with children shall be considered mandated reporters as regards possible abuse and/or neglect. SCACAP and/or its contracted CCPs will provide training on the indicators of possible child abuse/neglect to staff working directly with children.

As mandated reporters, any employee of SCACAP EHS, having reasonable cause to believe that any child with whom that employee comes in contact in an official capacity has suffered abuse, shall report or cause a report to be made immediately to the SC Department of Social Services.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships
 CCPs: Child Care Partners
 EHS: Early Head Start

PROCEDURE

South Carolina law identifies Early Head Start staff members as mandated reporters of suspected child abuse and neglect. And staff member who suspects (or witnesses) the abuse or endangerment of a child, is legally bound to report this to the SC Department of Social Services. Pursuant to state law this report may be made anonymously.

Understand both that you are protected in your role as a mandated reporter and that it is not your responsibility to determine the validity of such claims. Making a report does not (in itself) have any ill-consequences for the child or family - but simply alerts the appropriate authorities of your concern, so that they may investigate it properly in order to rule out danger to the child.

SCACAP Early Head Start incident reporting policy requires that we also make the Office of Head Start (OHS) aware of any known reports originating from the program. In the event a report of suspected abuse or neglect is made, it is your responsibility to immediately notify South Carolina Association of Community Action Partnerships (via your Education Coordinator or Teacher Mentor) so that supplemental reporting to OHS can be completed in a timely manner.

Identification of Child Abuse and/or Neglect and Response

Annual training will be provided to South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership employees who are working directly with children about awareness of the following indicators, remembering that these are indicators of possible abuse and/or neglect.

Indicators of Physical Abuse

PHYSICAL INDICATORS:

- Unexplained or repeated injuries (welts, bruises, burns).
- Injuries that seem to take the shape of an object (bruises looking like the shape of a belt buckle, electric cord, wooden spoon, cigarette burns).
- Injuries that don't make sense for the child's age (such as bruises on the legs or bottom of a child too young to walk or climb).
- Unlikely or different explanations of an injury given by parents and child.

INDICATORS OF NEGLECT:

- Child is dirty.
- Child is inappropriately dressed for the weather.
- Child is hungry or poorly fed.
- Child has health problems and is not getting medical or dental care.
- Child is consistently unsupervised.

BEHAVIORAL INDICATORS:

- Behavior problems such as verbal or physical aggression (hitting, bullying), social withdrawal (shy, quiet), non-compliance, impulsiveness, stubbornness.
- Child appears depressed, sad, lonely, cries easily.
- Delinquent behavior, cruelty to others or to animals, destructive to own or another's property; child is teased or teases others, steals.
- Child seems confused or nervous, clings or is overly dependent on adults.
- Child seems afraid of physical contact from parents or other adults, is afraid to go home at the end of the day.

Indicators of Sexual Abuse and/or Sexual Exploitation

AT SCHOOL:

- Insists on going to school, even if ill.
- Shows sudden change in behavior.
- Shows difficulty concentrating.

IN PEER RELATIONS:

- Initiates "sexual games" with peers.
- Shows an unusual interest in private parts.
- Is easily led or influenced by peers.
- Shows unusual anger or aggressiveness with peers.

IN ADULT RELATIONSHIPS:

- Avoids or shows an unusual fear of adults of the opposite sex.
- Touches adults inappropriately.
- Clings excessively to adults (physically).
- Makes inappropriate sexual comments.

PERSONAL HYGIENE:

- Exhibits excessive modesty related to toileting functions.
- Is overly demonstrative about toileting functions.
- Tries to "spy" on others during toileting functions.

BEHAVIORAL/EMOTIONAL INDICATORS:

- Appears unusually nervous or anxious.
- Shows sudden regression in behavior (**e.g.** thumb sucking, enuresis).

- Shows unusual changes in appetite.
- Demonstrates sexual motions.
- Masturbates excessively for age level.
- Verbalizes sexual content inappropriate for age.

MEDICAL/PHYSICAL INDICATORS:

- Complains of pain during urination.
- Swelling or discharge from genitals.
- Shows bruises or scratches unexplained by normal behavior.
- Have bloodstains on underwear.
- Has pain in anal, gastrointestinal, genital or urinary areas.
- Reacts inappropriately to medical exams.

OTHER INDICATORS:

- Displays extreme fear of certain place or person.
- Is overly interested in genital areas of dolls during play.

Indicators of Mental Injury or Emotional Abuse

PHYSICAL INDICATORS:

- Speech disorders or developmental delays.
- History of failure-to-thrive, or lag in physical development.

BEHAVIORAL INDICATORS:

- Behavioral extremes or mood swings (compliant and passive or aggressive and demanding).
- Poor peer relationships, lack of trust, social withdrawal.
- Antisocial, destructive, aggressive behavior.
- Child has nightmares, difficulty sleeping.
- Obsessive, compulsive traits, overeating, excessive physical complaints or illness.
- Child lacks vocabulary to express feelings, may be unaware of feelings.
- Depression, suicidal ideation, runaway.

Family Signs of Abuse

Families with the following kinds of problems or characteristics are at greater risk of child abuse, especially if there is change or crisis within the family, such as pregnancy and the birth of another child, separation and divorce, or the death of a family member. Child abuse can also occur in families without these characteristics.

- Families who are isolated; have no friends, relatives, church or other support systems.
- Parents who tell you that they were abused as children.
- Families who are often in crisis (moving a lot, money problems).
- Parents who seem very critical of their child for his/her age.
- Parents who are very rigid in how they discipline their child.
- Parents who have trouble with drugs or alcohol.
- Parents showing either too much or too little concern for their child.
- Parents who have a child they see as difficult (such as mentally or developmentally delayed, handicapped, or a premature infant) may be under a lot of stress, which can lead to abusive behavior.
- Families that have a lot of "secrets" that can't be talked about.

Response to a Child's Injury

Staff response to a child who reports victimization is very important. Give the child reassurance that she/he is okay and safe. Respect the privacy of the child. The child will need to tell his/her story in detail later to the investigators so do not press the child for details. Avoid display of horror, shock, or disapproval of the parent(s), the child or the situation. Avoid placing blame or making judgments about the parent(s) or the child. Tell the child that he/she will be talking to people who will help.

Any investigation will be done by/or through the Department of Social Services (SC DSS) or the Police Department, therefore, South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership employees will not do any investigation, and will be careful not to do anything to contaminate or interfere with any investigation that will be conducted by SC DSS staff. A member of the SCACAP Early Head Start Child Care Partnership team will be present during the interview, if possible.

Physical Abuse

In the presence of an observable injury, a South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership staff member will first question the child as to what happened. If the injury appears to be at variance with the explanation given for the injury, or if for any other reason abuse is suspected, then the reporting procedures described below will be followed.

Neglect

In the case of possible neglect (i.e., poor hygiene, inappropriate clothing, consistent hunger, lack of supervision, emotional problems, constant fatigue, etc.) a South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership staff member will first question the child. Follow-up will include talking to the parents, home visits if necessary, providing emergency assistance, and careful documentation. If the situation does not improve or if the neglect is serious enough to cause actual harm or substantial risk to the child's health, welfare or safety, then the reporting procedures described below will be followed.

Mental Injury or Emotional Abuse

If it is suspected that a child's emotional problems are the result of parental behavior (i.e., scapegoating, ridicule, degradation, threats to health and safety, confinement, etc.) a South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership staff member will first question the child. Follow-up may include talking to the parents, a classroom observation by a mental health consultant, referral to mental health agencies, staffing with teachers, parents and other professionals, etc. If the situation does not improve or if the mental injury is serious enough to constitute a handicap to the child's ability to function (to think, to learn, to feel) then the reporting procedures described below will be followed.

Sexual Abuse or Exploitation

If a child should demonstrate any of the sexual abuse indicators listed in this document, or if for any other reason sexual abuse is suspected, the reporting procedures described below will be followed.

Reporting:

As mandated reporters, any employee of SCACAP Early Head Start Child Care Partnership Program, having reasonable cause to believe that any child with whom that employee comes in contact in an official capacity has suffered abuse, shall report or cause a report to be made in the manner required in ORS 418.755.

Anyone participating in good faith in the making of a report, and who has reasonable grounds for making that report, will have immunity from any liability, civil or criminal, that might otherwise result from the making or content of such a report. Such a participant will also have immunity in respect to participation in any judicial proceedings resulting from such a report (ORS 418.762).

Reporting should be considered an expression of concern or a request for an investigation into a suspected incident of abuse or neglect. A report is a request for investigation into the condition of a child; it is the beginning of a helping process for children and families. It is not up to South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership employees to decide whether or not abuse has actually occurred.

It is the legal responsibility of any employee of SCACAP Early Head Start Child Care Partnership Program who suspects abuse and/or neglect to adhere to the following procedures:

1. An oral report will be made immediately by telephone to the local office of the Department of Social Services (DSS) or to a local law enforcement agency. It is preferable that the person who has witnessed the suspected abuse or neglect (or indicators thereof) makes the report.
2. Following any report of suspected abuse or neglect to the SC Department of Social Services, the reporting staff member must immediately notify South Carolina Association of Community Action Partnerships of the report, via the center's assigned Education Coordinator or Teacher Mentor. SCACAP is required to make a supplemental report to the federal Office of Head Start and will take responsibility for such.
3. South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership staff will not contact the family involved, as this may interfere with the DSS investigation.
4. If follow-up is necessary, meetings will be scheduled with the appropriate people.
5. The staff person who initiated the report will keep SCACAP informed as to the status of the case. Follow-up documentation regarding the disposition of the case will be sent to the SCACAP EHS Office and will be included as part of the record.

Child Abuse Allegations Against a Staff Member

South Carolina Association of Community Action Partnerships, Early Head Start- Child Care Partnership will not tolerate any form of abuse or neglect of a child. Incidents which involve staff are also reported to the required state authorities, Center Supervisor and EHS Director. The Center Director, working in coordination with the EHS Director, will remove the staff person from involvement with children and/or place the individual on leave or suspension until the investigation is completed. In the event that a case of abuse or neglect involving an EHS staff member is determined to be founded by the SC Department of Social Services, the employee will be terminated immediately. In the event that allegations of abuse/neglect are determined to be unfounded by the SC Department of Social Services, staff members named in the abuse/neglect complaint will be required to participate in supplemental training provided - or procured - by SCACAP.

Immediately following this report, the employee who identified concerns will complete an incident report. The family services staff notifies the Center Supervisor and is responsible for delivering the Incident Report. Incident reports pertaining to reportable events are submitted immediately to the EHS Director. The EHS Director will immediately notify the Executive Director of any reports or investigations.

Child Abuse and Neglect Training

SCACAP EARLY HEAD START CHILD CARE PARTNERSHIP PROGRAM will provide training on Child Abuse and Neglect for staff and parents.

Staff Training

Annual Pre-Service training will be provided for staff on the identification and reporting of child abuse and neglect. Additional workshops and classes will be accessed as available.

Staff will also be provided with a current *Community Resource Directory*. Training in the use of the directory, available resources, and the South Carolina Association of Community Action Partnerships Early Head Start

Child Care Partnership referral process will take place annually at Pre-Service or during in-service.

Parent Orientation and Training

During the enrollment process, the parent(s) or guardian(s) of enrolled children will receive verbal and written information on the program mandate to report suspected cases of abuse and neglect. This information is included in the *Parent Handbook* in the form of a *Child Abuse and Neglect Statement*. At this time, an orientation will be provided for parents and family members of enrolled children on the need to prevent abuse and neglect, and the need to provide protection for abused and neglected children. Families will be informed that South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership strives to keep families together, to identify family strengths and to build on those strengths to assist families in crisis. Staff will assist the family in its own efforts to improve the condition and quality of family life through the Family Partnership process, individual problem solving, and Parent Committee Meetings.

Parents will be given a copy of the current *Community Resource Directory*. Staff will instruct parents and family members in the use of the directory, the resources available, and in methods of accessing those resources.

On-Site Interview of Alleged Victims of Child Abuse

South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership staff must recognize that in sensitive interviews, depending on the age of the child and nature of the child/abuse neglect referral (such as child sexual abuse), the involvement of a staff member may interfere with the investigation and the teacher may not be asked to participate in the interview.

A Department of Social Services caseworker and/or law enforcement officer will conduct the interview.

It is the responsibility of the DSS caseworker and/or law enforcement officer to inform the child's parents/guardian in a timely manner that a site interview has occurred, and inform the parent of the final disposition of the investigation. A "timely manner" shall in most cases, be considered immediately after the child's interview, and/or by the end of that same day, whenever possible. All other questions and inquiries will be referred to the assigned DSS caseworker.

Under South Carolina law, the law enforcement agency or the State of South Carolina Department of Social Services caseworker investigating a report is hereby authorized to photograph such a child for the purpose of providing documentary evidence of the physical condition of the child. It is not appropriate for SCACAP EARLY HEAD START CHILD CARE PARTNERSHIP PROGRAM staff to substantiate abuse or neglect by taking photographs of the alleged child victim.

Procedure

The following guidelines will be observed when an alleged victim of child abuse or neglect is to be interviewed by a State of SC Department of Social Services caseworker and/or law enforcement officer at the South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership site.

1. The caseworker or law enforcement officer must contact the appropriate South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership staff person, present proper identification, and make known the name of the child to be interviewed.
2. South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership will provide a non-threatening setting for the interview.
3. A South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership staff person may be invited to attend the interview as a neutral observer, or to provide

emotional support for the child.

Removal of Child from the Site

Any alleged victim of child abuse and neglect may be removed from the South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership program site and placed in protective custody by a Child Protective Services caseworker and/or a law enforcement officer for the child's protection.

South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership will make no attempt to notify the parents. If the child's parents contact South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership prior to being located by the investigative team, South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership will refer them to the Department of Social Services and will provide no further information.

Procedure

If the investigative team finds reasonable cause to believe that abuse has occurred, the team shall take necessary action to prevent further abuse of the child and to safeguard the child's welfare.

If a child is placed in protective custody by Department of Social Services, an investigative team member and law enforcement officer shall notify the parent or guardian that the child is in protective custody. Parental notification that the child was placed in protective custody will be made as soon as possible.

The DSS caseworker may share appropriate information and facts concerning the alleged abuse with the South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership employee who made the report. The South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership employee and/or program agree to maintain all such information as confidential. The DSS caseworker shall present appropriate identification to South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership staff.

A law enforcement officer shall sign and leave a copy of a legal child removal form before leaving the South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership program site with the alleged child victim of abuse or neglect.

Protected Child Status

Definition: A child who is legally in the care of South Carolina Department of Social Services as a Foster Child and/or a child who has a Restraining Order in their files.

South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership staff will make every possible effort to prevent the removal of a child from the premises by an unauthorized person. However, a South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership employee cannot be expected to put his or her own life or the life of the child at risk by interfering with the forcible removal of that child from the South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership site. In the event of a forcible removal of a child, the police will be notified immediately, followed by Department of Social Services, the South Carolina Association of Community Action Partnerships Early Head Start Director, and the child's Legal Guardian.

Procedure

Any child who is enrolled in the SCACAP EARLY HEAD START CHILD CARE PARTNERSHIP PROGRAM as a PROTECTED CHILD will be required to have the following information in the Child File:

1. Parent Name(s) and Legal Guardian Name(s).
2. If a Restraining Order is in effect, a copy will be in the file. If the status of the Restraining Order changes at any time, the Legal Guardian must notify SCACAP EARLY HEAD START CHILD CARE PARTNERSHIP **PROGRAM** immediately in writing.
3. A *Protected Child Agreement* will be signed by the child's Legal Guardian and the South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership Director and placed in the file. The appropriate staff will be advised of the child's protected status.
4. If the designated pick-up and delivery person changes at any time, the Legal Guardian will be responsible for delivering, in person, to SCACAP EARLY HEAD START CHILD CARE PARTNERSHIP PROGRAM any change in writing. Copies of the change will be placed in the file and the Center Director will be notified. The child will be released only to authorized individuals as listed on the *Protected Child Agreement* and the *Child Release and Emergency Contact Form*.
5. If the child is in a "Reunification Plan" with the State of South Carolina, SCACAP EARLY HEAD START CHILD CARE PARTNERSHIP must be notified in writing by the DSS caseworker. SCACAP EARLY HEAD START CHILD CARE PARTNERSHIP PROGRAM will be represented in any staffing if the plan includes the parent's involvement in the South Carolina Association of Community Action Partnerships Early Head Start Child Care Partnership classroom. SCACAP EARLY HEAD START CHILD CARE PARTNERSHIP **PROGRAM** will prepare the parent for the classroom to assure a positive experience for both the parent and the child.

The staffing review will include the child's teacher, the Family Advocate, and the parent or individual designated by the state as the person to be involved in the reunification. Documentation of this meeting will be reviewed by the Center Director and then placed in the Child File.

Procedure Title:	Incident Reporting		
Procedure Number	8.2	Effective Date:	April 4, 2018
Policy Title Reference:	8.2 Incident Reporting	III	
SCACAP Executive Director Approval Date;	April 4, 2018	EHS Director Approval Date:	April 4, 2018
Revisions Dates:			

POLICY

Policy 8.2 - Incident Reporting

DEFINITIONS

SCACAP: South Carolina
 Association of Community Action
 Partnerships EHS: Early Head Start
 DSS: SC Department of Social Services

PROCEDURE

Formal incident reports will be completed in the event of any significant event involving:

- A child injury that requires outside medical attention
- The health and safety of program participants
- A classroom closure (any instance in which families are denied care)
- The mandated reporting of suspected child abuse/neglect (whether in the home or in the school) to the South Carolina Department of Social Services (DSS)
- Participation of law enforcement officials

Centers will also inform SCACAP immediately of any permanent staffing changes.

In the event of such an incident, SCACAP EHS will follow the following procedure:

- 1) Any SCACAP staff member made aware of such an incident will immediately notify both the EHS Director and Quality Assurance Coordinator. The EHS Director will be responsible for informing senior management of any incident requiring immediate attention.
- 2) Immediately, or as soon as practicable, the employee involved (or notified) will complete an incident report and provide a copy to both the EHS Director and Quality Assurance Manager. **This report will ideally be completed during the same business day as the notification, but no later than 10am on the following business day.**
- 3) In consultation with the senior agency management, the EHS Director will be responsible for formally notifying:
 - a. Head Start Region IV office, via the Head Start Enterprise System's Communication Tab (as soon as practicable, but no later than 10am of the day following the incident report's submission by staff).
 - b. The Policy Council Chair (concurrent with upload into HSES)
 - c. The Early Head Start Governance Council Chair (concurrent with upload into HSES)

Following submission of the incident report into the Head Start Enterprise System (HSES), the EHS Director will contact the Region IV program specialist by telephone to discuss the incident report. This telephone contact will be considered supplemental to the formal report submission and does not replace it.

- 4) The Executive Director of SCACAP to School Readiness shall be responsible for notifying the Chair of the SCACAP Board of Trustees, as appropriate.
- 5) Following notification by the employee and submission of the initial incident report, the reporting employee shall work in collaboration with the Quality Assurance Coordinator to ensure the collection of any supplemental documentation appropriate. These supporting documents, as applicable, will be uploaded to the HSES Communication tab by the EHS Director or his/her designee as supplemental information supporting the incident report.

9.0 Child Health and Developmental Services

- 9.1 Determining Child Health Status
- 9.2 Screening for Developmental, Sensory and Behavioral Concerns
- 9.3 Dental Hygiene, Screenings and Assessments
- 9.4 Health Emergencies
- 9.5 Emergency Evacuation
- 9.6 Medical Conditions and Short-Term Exclusion Due to Illness
- 9.7 Medication Administration
- 9.8 First Aid Supplies and Emergency Information
- 9.9 Health and Safety Inspections, Injury Prevention
- 9.10 Emergency Preparedness and Closure
- 9.11 Universal Precautions/Blood Borne Pathogens
- 9.12 Classroom Sanitation
- 9.13 Hand Washing
- 9.14 Diapering and Toileting

Procedure Title,	Child Health Services		
Procedure Number:	9.1	Effective Date:	October 1, 2018
Policy Title Reference:	Child Health Status		
Sub procedures	<ul style="list-style-type: none"> a. Child Health Services Intake 1302.42 b. Daily Health Assessments 1302.42(c) c. Confidential Health Records d. Parental Refusal of Health Services 1302.41(b)(i) e. Payment for Health Services 1302.42(e)(2) f. Immunization Status 1302.42(b)(i) g. Health Services Advisory Committee 1302.40(b) 		
Regulation References:	4SCFR1302.40(b); 1302.42(b)(1)(i)		
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

EHS Health Services staff will maintain an efficient and effective record-keeping system to provide accurate and timely medical/dental information for EHS children. Initial intake will include documentation of the child's current health and immunization status, with a child physical and oral assessment to follow. Teaching staff will conduct health checks on a daily basis when children arrive each morning. Each enrolled child's growth is monitored, growth charts will be completed on an ongoing basis. Confidentiality of health records will be maintained to protect EHS children and families. All correspondence, discussions, staffing, and case managements and records will remain confidential. EHS will follow Health Insurance Portability and Availability Act (HIPM) standards and procedures for keeping child and family information private and secure.

Confidentiality of health records must be maintained to protect EHS children and families. All correspondence, discussions, staffing, and case managements and records are to remain confidential. EHS will follow Health Insurance Portability and Availability Act (HIPAA) standards and procedures for keeping child and family information private and secure.

To respect each family's decision whether or not their child should receive suggested health services, parents/guardians have the right to refuse authorization. A written refusal must be signed by the parent/guardian and kept in the child health files.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

HIPPA: Health Insurance Portability and **Availability** Act

PROCEDURES

a. CHILD HEALTH SERVICES INTAKE

SCACAP Early Head Start Health Services staff will maintain an efficient and effective record-keeping system to provide accurate and timely medical/dental information for Early Head Start children.

Procedure:

1. Health Services staff will collect medical and dental information for each participant. Health and dental care documentation (including care plan) will be kept in the participant's health file.
2. The Health Services staff will enter results of screenings, medical/dental information, and referrals for children into the data management system (ChildPlus).
3. Health Services staff will monitor the data management system for completion of services and new enrollees.
4. Health Services staff will document health care tracking and follow up services for each program participant. Notation about allergies, special diet, chronic illness or other health related concerns will be filed as well.

Resources:

Physical examination form
Health History screening form
EPSDT screenings recommendations
Dental Screening/Examination Forms
ChildPlus

b. DAILY HEALTH ASSESSMENTS

Teaching staff will conduct health checks on a daily basis when children arrive each morning.

Procedure:

1. The teaching staff will check each child upon arrival using the Good Morning Health Check as a guide. (See page following the procedure). This routine should be accomplished in a non-threatening manner (i.e., greeting games can be used). This check should be done before the parent or guardian leaves the child in the room so those children who appear to be ill can be taken home or to the doctor/clinic as appropriate. *Children who appear to be ill should not remain in the classroom with other children until evaluated.*
2. The following is a list of possible signs/symptoms to check:
 - *General appearance: body, hair, clothing, diaper clean and dry*
 - *Emotions: happy, sad, scared*
 - *Energy level: tired*
 - *Extreme hunger in the mornings: Does the child behave or look differently? Does the child complain of not feeling well?*
 - *Fever may be present if child appears fatigued, or lethargic.*
 - *Hair: Check for lice, check for itchy scalp, and check to see if hair is clean.*
 - *Hands: Check for sores, wounds, or unusual burns or scars.*
 - *Arms and legs: Check for unusual cuts, bruises, burns, rope marks, or new sores or wounds. Talk with the child to find out how the injury occurred and when.*
 - *Face and Head: Check for cuts, bruises, sore spots (may check by lightly rubbing hand over head when greeting child). Check for irritated, red or matted eyes.*
 - *"Hidden" Areas: Watch for obvious signs of physical or sexual abuse during first bathroom break/diaper change (bruising, pain during urination or bowel movement, bleeding).*
 - *Skin: Check for rashes or skin irritations.*
 - *Feet: Check for sores, wounds, or bruises (may check during naptime).*
 - *Obvious signs of illness: Check for lethargy; runny nose; red, irritated, watery, or swollen eyes; upset stomach; warm to the touch.*
 - *Does the child appear dehydrated or fail to urinate, fail to eat or drink as much as usual?*
 - *Does the child have hard stools or diarrhea? Has the child vomited?*

3. Signs/symptoms observed consistently or which appear severe will be reported to Health Services staff or Center Director.
4. If any signs/symptoms are noted, the teacher should write specific details of the observation on Daily Health Check Sheet, ask the parent to sign and make the Center Director aware of observations.
5. Parents will be empowered to handle the medical needs of their child by staff providing information on community resources for medical services and transportation. Staff will follow up to see if services were obtained for the child.
6. If child abuse/neglect is suspected refer to the Child Abuse policy. Teachers are mandated reporters.
7. Mental Health staff/ Family Advocate will be notified of any developmental or behavioral changes in a child.

Resources:

Daily health check forms

c. CONFIDENTIAL HEALTH RECORDS

Confidentiality of health records must be maintained to protect Early Head Start children and families. All correspondence, discussions, staffing, and case managements and records are to remain confidential. Early Head Start will follow Health Insurance Portability and Availability Act (HIPAA) standards and procedures for keeping child and family information private and secure.

Procedure:

1. Health records must be stored under lock and key and kept away from public access to prevent unauthorized review.
2. Information may not be shared with unauthorized persons without the specific consent of the parent.
3. Telephone requests for information are not acceptable unless the parent has previously authorized the release of this information.
4. Information collected by others and forwarded to the Early Head Start-CCP staff with parental consent becomes part of the child's record and thus becomes the burden of confidentiality for the Early Head Start program.
5. All Release of Information forms requesting a child's health or dental status should be properly uploaded and logged into CHILDPPLUS.
6. Parents have a right to see all information in their child's file at any time.
7. On the Release of Information form, parents will be made aware of the nature and type of all information collected and how it will be used.
8. Parents may ask to speak to staff in confidence. Staff must receive this information in a responsible, confidential manner. This is particularly true in relationship to child abuse. The staff's primary responsibility is to protect the child.
9. A File Access sheet is to be signed by any staff member who accesses the child's folder.
10. Staff health information will be kept in a locked cabinet in Human Resources office.
11. SCACAP staff will receive training concerning confidentiality of records and information.

d. PARENTAL REFUSAL OF HEALTH SERVICES

To respect each family's decision whether or not their child should receive suggested health services, parents/guardians have the right to refuse authorization. A written refusal must be signed by the parent/guardian and kept in the child health files.

Procedure:

1. When a parent/guardian refuses health services for their child, Health Services staff will engage and educate the family about the importance of health screening (developmental and sensory), hemoglobin/hematocrit and lead testing, dental care and growth assessment measurements.
2. A Refusal of Services Form will be completed if a parent refuses to give authorization for, or to obtain recommended health and/or developmental services. This documentation will be kept in the child's file.

Resources:

Health Refusal Documentation Form
Written statement from parent/guardian

e. PAYMENT FOR HEALTH SERVICES

SCACAP EARLY HEAD START requires that Early Head Start funds be used for exams and treatment only when no other source of funding is available. If a family has private insurance, or is eligible for Medicaid, these sources of funding must be used to their full extent before SCACAP EARLY HEAD START can pay for services.

Procedure (Initial Exam)

When a SCACAP EARLY HEAD START staff member believes that Early Head Start payment may be required, the staff member will contact the Health Coordinator with the following information: the child's name, date of birth, parent/guardian's name, the suggested treatment, reason for lacking insurance, and the family's health care provider's name and address.

The Health Coordinator will then contact the health care professional and request a reduced fee for health service for the Early Head Start child. If the family has no Health provider, Early Head Start will refer them to a provider that has agreed to accept a reduced fee.

The Health Coordinator will then complete a purchase order form including: the purchase order number; the date; name, and address of the doctor or dentist; the child's name; staff signature; and the number of days the purchase order is valid. Purchase orders will be valid for 30 days, except toward the end of the school year, at which time, any exam or treatment must be completed on or before the last day of class.

The completed purchase order will be sent directly to the health service provider. Following service, the purchase order will be returned to Early Head Start's Fiscal Manager.

Procedure (Follow-Up Exam)

Parent/guardians (or Doctor's office if Release of Information has been signed) will let the program know the health care provider's recommendation for treatment. The Health Coordinator must then be contacted for approval. Following approval, the Health Coordinator will contact the health care provider for an estimate of treatment cost. A new purchase order will then be forwarded to the health care provider. The health care provider will return the purchase order form to Early Head Start's Fiscal Manager following treatment.

Unless treatment by a specialist is necessary, the family must use their own health care provider or one of the service providers listed as having a reduced-fee agreement with Early Head Start. The Health Coordinator can advise staff and families as to possible service providers and specialists.

f. IMMUNIZATION STATUS

All children in the Early Head Start program will be current on their immunizations. Parents will be assisted in making necessary arrangements to bring the child up-to-date on immunizations. To assist families in the protection from and prevention of childhood communicable diseases, SCACAP Early Head Start Health Services staff will adhere to immunization requirements set by the South Carolina Department of Health and Environmental Control.

Procedures:

1. SCACAP Early Head Start will encourage parents to obtain all up-to-date immunizations unless a signed immunization waiver is for medical, religious or other stated reasons.
2. SCACAP Early Head Start Health Services staff will engage families of enrolled children to ensure timely compliance of all up-to-date immunizations in accordance to current Center for Disease Control guidelines recommended schedule of immunizations
3. If immunization status is not up-to-date, a missing health information letter will be sent to the parents in a timely manner. Center Director will be notified as this is also a state licensing requirement. Parents will be informed of local clinic referral. Health staff will keep record of incomplete immunization and will repeatedly notify parents.
4. In accordance with South Carolina Code of Laws, Section 44-29-180, and State Regulation 61-8, the 2014-2015 "Required Standards of Immunization for Day Care Attendance", all children 3 month and older must maintain a valid Certificate of Immunization.
5. A notice of final date of attendance will be sent to parent/guardian within 30 days of expiration of immunization certificate.
6. All out of state immunization certificates must be converted to South Carolina's Certificate of Immunization form (DHEC 2740).

Resources:

- CDC Vaccination schedule
- SC Immunization Requirement for School and Day Care
- Missing Health Information Letter (Immunizations/Well Check Ups)

g. HEALTH SERVICES ADVISORY COMMITTEE

In an effort to bring professional experts together periodically to review and evaluate Early Head Start medical standards of practice and local needs and problems, SCACAP Early Head Start will establish and maintain a Health Services Advisory Committee (HSAC) which will include Early Head Start parents/staff, community professionals, community partners, and other volunteers from the community.

Procedure:

1. Each member is a vital and special person to our health staff. Numerous phone calls and emails are made to keep up the communication between members between meetings as to address any issues that arise as well as get information and guidance from those who specialize in their respective fields.
2. The Health Advisory Committee will meet two or more times yearly.

3. Performance Standards, budgets, timelines, plans, policies and procedures will be discussed and planned.
4. Each member will be welcome to submit any questions, concerns or ideas at any time
5. Each member absent will be sent a copy of all documents and minutes from the missed meeting.
6. Every effort will be made to notify members in advance of upcoming meetings. Each member will be given notification that allows him or her planning time to attend the upcoming meetings.
7. Orientation packets will be distributed at the beginning of the year containing information about the Early Head Start program and guidelines. Updates will be sent as they become available.
8. Each Member of the Health Services Advisory Committee will sign a confidentiality agreement with SCACAP.

Resources:

HSAC Commitment letter

SCACAP Confidentiality Agreement

Procedure Title:	Screening for Developmental, Sensory and Behavioral Concerns		
Procedure Number	9.2	Effective Date:	October 1, 2018
Policy Title Reference:	Screening for Developmental, Sensory and Behavioral Concerns		
Sub procedures	<ul style="list-style-type: none"> h. Source of Health Care i. Health Screenings (45Day) j. Health Examinations (90Day) k. Physical Examination l. ESDST 		
Regulation References:			
Forms:	III		
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP will engage families to ensure all enrolled children have ongoing access to accessible health/dental care and child developmental screenings. Within 45 calendar days of the child's entry into the program, SCACAP will receive documentation of age appropriate screening results to identify concerns regarding a child's developmental and sensory (visual and auditory). If these are not available, the SCACAP and/or CCP staff will provide applicable screenings. To the extent possible, these screening procedures will be sensitive to the child's cultural background.

SCACAP will engage families to ensure all enrolled children have access to ongoing sources of medical and dental care upon entry into child's program. SCACAP EHS will determine from health care professionals the health status of each child according to EPSDT.

SCACAP will ensure every child entering the program is up-to-date on scheduled preventative health care and that children and families have a medical home. All EHS participants (children and expectant mothers) shall remain up-to-date on scheduled preventative health care and maintain a medical home.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships
EHS: Early Head Start
EPSDT: Early and Periodic Screening, Diagnosis and Treatment

PROCEDURES

a. SOURCE OF HEALTH CARE (30 DAY)

SCACAP EARLY HEAD START will within 30 calendar days after the child first attends the program must consult with parents to determine whether each child has ongoing sources of continuous, accessible health care - provided by a health care professional that maintains the child's ongoing health record and is not primarily a source of emergency or urgent care - and health insurance coverage.

If the child does not have such a source of ongoing care and health insurance coverage or access to care, SCACAP EARLY HEAD START must assist families in accessing a source of care and health insurance that will meet these criteria, as quickly as possible.

b. HEALTH SCREENINGS (45 DAY)

SCACAP EARLY HEAD START will engage families to ensure all enrolled children have access to on-going sources of continuous accessible health/dental care and child developmental screenings. Within 45 calendar days of the child's entry into the program, SCACAP EARLY HEAD START will obtain or perform age appropriate screening procedures to identify concerns regarding a child's developmental and sensory (visual and auditory (see 45 CFR 1308.6(b)(3) for additional information). To the greatest extent possible, these screening procedures will be sensitive to the child's cultural background.

Procedure:

1. The Center Staff and SCACAP EARLY HEAD START staff will ensure that all enrolled children will obtain the documentation of or perform the following screenings **within 45 days** of program entry date:
 1. Developmental (visual/motor, language and cognition, and gross motor/body awareness)
 2. Behavioral observation/screening
 3. Sensory (hearing and vision)
2. Screenings will be conducted by Health Professionals or Early Head Start staff within 45 days of enrollment. SCACAP EARLY HEAD START will make efforts to assist and engage parents to complete screenings prior to start of program year. Information regarding screenings will be provided at intake to obtain consent for services.
3. Health tracking will be reviewed weekly (at least 30 days) from the first day of the program year, to ensure no screenings have been missed. Results will be entered in the data management system as soon as possible after information is obtained or screenings are completed. Results will be found in the child's file and CHILDPPLUS.
4. Multiple resources (physical exams, ASQ results, parent/staff input) will be incorporated in order to determine appropriate follow-up. Results of screening will be shared with parent upon completion to assure appropriate follow-up and/or treatment in necessary.

c. HEATH **EXAMINATIONS** (90DAY)

SCACAP EARLY HEAD START will engage families to ensure all enrolled children have access to on-going sources of continuous accessible medical and dental care upon entry into child's program (first 30 days). SCACAP EARLY HEAD START will determine from health care professionals the health status of each child according to EPSDT.

Procedure:

1. The Center Staff and SCACAP EARLY HEAD START staff will obtain determination if all enrolled children will have the following screenings **within 90 days** of program entry date (as age applicable):
 1. Lead Screening (in according to SC EPDST schedule)
 2. Hemoglobin/Hematocrit Screening (in according to SC EPDST schedule)
 3. Documentation of Well Child Check (no medical home, a referral will be provided)
 4. Dental Screening/Exam (excluding those with dental home and proof of dental exam)
 5. Growth Assessment (Height and Weight measurements from Well Child Check)
 6. Health History-As best practice to determine child health status or condition
 7. Nutrition Assessment-family history, special dietary requirements & food allergies

SCACAP EARLY HEAD START will make efforts to assist and engage parents to complete exams as promptly as possible.

2. Health tracking will be reviewed monthly (at least 30 days) from the first day of the program year, to ensure no screenings have been missed.

3. Examination results will be entered in the data management system as soon as possible after information is obtained or screenings are completed. Results will be found in the child's file and/or CHILDPLUS.

Resources:

SCACAP EARLY HEAD START 30/45/90 Requirement Tracking Form
SCACAP EARLY HEAD START Physical Examination/Well Check-up form
Ages and Stages Questionnaire: 3
Ages and Stages Questionnaire: SE 2

d. PHYSICAL EXAMINATION-WELL CHILD CHECK

To ensure every child entering the program is up-to-date on scheduled preventative health care and that children and families have a medical home.

Procedure:

1. All children entering an Early Head Start program must have had a physical examination/well child check upon entry. If not, families have 90-days to accomplish this examination and submit the information to Health Services.
2. If any required test(s) is not included on the child's physical examination or well child check form, such test(s) must be completed and documented within 90 days of a child's first day in attendance.
3. The physical examinations shall be updated in accordance to current EPSDT guidelines. Documentation shall be kept in the child's file. Required exam and testing include:
 - Physical Examination/Well Child Assessment
 - **Up-to-date** immunizations
 - Growth Assessment: Height and Weight (from Well Child Check)
 - Sensory Screenings: Hearing/Vision
 - Dental Screening/Examination
 - Hemoglobin/hematocrit testing (see details below)
 - Blood lead level check (see details below)
4. Hemoglobin/Hematocrit and Blood Lead tests may be performed either prior to or following program entry.
 - a. Blood Lead Level for all enrolled children must be tested at 9 to 12 months and 24 months of age.
 - b. Hemoglobin/Hematocrit will be performed in compliance with South Carolina's Medicaid EPSDT Recommendations for Preventative Pediatric Health Care (Hemoglobin performed at 9 to 12 months and thereafter based on risk assessment). If not previously tested prior to program entry, then test is required of enrolled children.

It is recommended that the above-cited tests be performed when updating the child's physical exam/ well child check in order to accommodate physician scheduling.

5. Centers will make every effort to assist families to accomplish these screenings if the primary health care provider is not able to do them.
6. If parents/guardians fail to complete necessary paperwork/follow-up within the timeline, a letter may be sent indicating the required missing information. SCACAP EARLY HEAD START staff will assist parents in making arrangements to obtain necessary health information/follow-up.

7. Parents/guardians are required by Head Start guidelines to follow-up on medical treatment needed by any enrolled child. It is the responsibility of the SCACAP EARLY HEAD START staff to follow-up with the parent/guardian about needed treatment and offer assistance as needed, particularly areas determined by their health care provider as "under care." If the parent/ guardian does not wish to pursue follow-up treatment as indicated by the medical provider a note that services are refused should be placed in the child's file.

Resources:

SCACAP EARLY HEAD START Physical Examination/Well Check-up form
SCACAP EARLY HEAD START Health Referral and Treatment Record form

e. **EPSDT**

All Early Head Start (EHS) children shall remain up-to-date on scheduled preventative health care and maintain a medical home.

Procedure:

1. Upon enrollment, all children must be up-to-date on well-child physical examinations as defined by the Early Periodic Screening Diagnosis, and Treatment (EPSDT) schedule. Families have 90 days to obtain an updated examination and submit the form to EHS.
 - a. Parents/guardians should take the SCACAP EARLY HEAD START Physical Examination/Well Check- up form to their primary health care provider.
 - b. If any required test(s) is/are not included on the child's physical examination form, such test(s) must be completed and documented within 90 days of a child's first day in attendance.
2. Physical examinations/Well child checks shall be updated according to current EPSDT guidelines. Documentation shall be kept in the child's file.
 - a. SCACAP Early Head Start Health Services staff and Family Advocates will engage families to accomplish these screenings if the primary health care provider is not able/available to do them.
 - b. SCACAP Early Head Start Health Services staff and Family Advocates are expected to provide intensive advocacy with the family to make arrangements to obtain necessary paperwork/follow-up.
3. Parents/guardians are required by Early Head Start guidelines to follow-up on recommended medical treatment. It is the responsibility of the Health Services staff and Family Advocates to follow-up with the parent/guardian about needed treatment and offer assistance as needed, particularly in areas determined by their health care provider as "under care." If the parent/ guardian does not wish to pursue follow-up treatment as indicated by the medical provider, documentation that services are refused should be placed in the child's file.

Resources:

SCACAP EARLY HEAD START Physical Examination/Well Check-up form
SCACAP EARLY HEAD START Health Referral and Treatment Record form

Procedure Title:	Dental Hygiene, Screening, and Assessment		
Procedure Number:	9.3	Effective Date:	October 1, 2018
Policy Title Reference:	Dental Hygiene, Screening, Assessment and Treatment		
Sub procedures	<ul style="list-style-type: none"> m. Dental Screening and Treatment n. Tooth Brushing 		
Regulation References:	45CFR1302.42(b);1302.43		
Forms:	III III		
SCACAP Executive Director Approval Date;	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP encourages dental health and the development of health skills that will last a lifetime. Tooth brushing is one way to promote basic dental hygiene. Teachers regularly brush and/or supervise children's tooth brushing, provide demonstrations and dental health education and model good tooth brushing techniques and dental hygiene in association with meals.

In order to promote quality oral health care, the program shall ensure that all children have a dental assessment/screening within 90 days. SCACAP EHS Staff will determine existence of a dental home, and assist as needed in regards to securing follow-up care and treatment.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships
EHS: Early Head Start

PROCEDURES

f. DENTAL SCREENING AND TREATMENT

In order to promote quality oral health care, the program shall ensure that all children have a dental assessment/screening, need for follow-up examination and/or treatment is determined, determine existence of a dental home, and assist as needed in regard to securing follow-up care, treatment, and/or a dental home.

Procedure:

1. It shall be determined within 30 days of enrollment and documented whether each child has a medical and dental home for ongoing, continuous care. SCACAP EARLY HEAD START Health Services shall assist the family in locating a dental home as needed.
2. Upon entry, parents will provide oral health care information and children will have a dental screening or assessment within 90 days of Initial entry.
3. Centers will assist families as much as possible to have dental screening/examination completed within 90 days of entry and to procure follow-up treatment. Follow-up assistance will be documented in the child's file.

4. Parents/guardians are required by Head Start guidelines to follow-up on dental treatment needed by any enrolled child. It is the responsibility of SCACAP EARLY HEAD START staff to follow-up with the parent/guardian about needed treatment and offer assistance as needed. If the parent/ guardian does not wish to pursue follow- up treatment as indicated by the medical provider a statement signed by the parent that services are refused should be placed in child's file.

Resources:

SCACAP EARLY HEAD START Dental Screening Report form SCACAP
EARLY HEAD START Dental Examination Form Dental health letter
regarding EPSDT

g. TOOTH BRUSHING

To promote and model good dental health practices, Early Head Start centers will integrate dental health education into ongoing classroom activities including tooth brushing at least one time during the day. Dental caries prevention education is introduced in centers and classroom due to communities with varying water fluoridation levels.

Procedure:

1. Each toothbrush will be labeled with the user's name. Soft bristled toothbrushes are recommended.
2. To ensure that the child is brushing properly, adult supervision must be provided. Staff will wear gloves while assisting. Fluoride toothpaste must be utilized when brushing.
3. Staff will ensure each child rinse their toothbrush before and after use. If toddlers are unable to do it alone, Early Head Start staff will rinse.
4. Infant's gums and mouth should be gently wiped with a clean, moist baby wash cloth or gauze pad. After the first tooth emerges, an infant-sized toothbrush can be used without toothpaste.
5. SCACAP EARLY HEAD START will follow the following recommended guidelines for infants and toddlers:
 - Infants with no teeth - teachers will continue to clean their gums with gauze and water after every bottle or meal
Older infant has teeth until two years of age -teachers brush teeth AT LEAST ONCE DAILY using a smear of fluoride toothpaste and water.
 - At the age of two-AT LEAST ONCE DAILY, teachers will use a pea-sized amount of fluoridated toothpaste on the child's toothbrush having the child spit as he/she is able.
6. Teeth should be brushed in an orderly sequence so no tooth is missed. The following routine is suggested:
 - Brush all outside (cheek side surfaces) of the upper teeth starting on one of the last (back) upper teeth. Clean each tooth around to the front and to the last tooth on the other side.
 - Brush all the inside surfaces of the upper teeth from one side of the mouth to the other.
 - Brush the chewing surfaces of the upper back teeth.
 - Start brushing the lower teeth on the cheek side of one of the last (back) lower teeth. Carefully brush each tooth around the mouth to the last tooth on the other side.
 - Brush all the inside surfaces of the lower teeth in order.
 - Brush the chewing surfaces of the back teeth and brush any debris off the tongue with a gentle stroke.
 - After brushing, children that can spit, should. The toothbrush should be rinsed thoroughly and put away to air dry.

7. Teachers will store toothbrushes in holders to prevent contamination. Toothbrushes **must not touch** each other when stored. Toothbrush holders will **not** be stacked on top of each other when stored. Toothbrush holders will be cleaned with a soap and water solution, rinsed and dried on an as needed basis.
8. Early Head Start teachers will *not* store toothbrushes in the diaper changing area or the toileting area.
9. New toothbrushes will be issued to children at least every three months or more often as needed. Toothbrushes will be given out throughout the year if bristles are worn, or a child has a contagious illness, including colds or flu.
10. Teachers will assess children's teeth during tooth brushing procedure for observable dental concerns.

Resources:

Oral Health revision (2007)-ACF-PI-HS-06-03

Procedure Title:	Health Emergencies		
Procedure Number	9.4	Effective Date:	October 1, 2018
Policy Title Reference•	Health Emergencies		
Sub procedures	o. Health Emergencies p. Dental Emergencies		
Regulation References:	45CFR1302.47(b)(4)(1)U);1302.47(b)(7)		
Forms:	<div style="display: flex; justify-content: space-around;"> III III </div>		
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

In emergency situations, direct service staff members will be prepared to act quickly to ensure the health and well-being of each child. All contracted Direct Service staff members are required to maintain current first aid and pediatric CPR certification.

In the event of any health emergency, the CCP will notify the parents and Health Services Manager immediately.

DEFINITIONS

CPR: Cardio-Pulmonary Resuscitation

CCP: Child Care Partner site

PROCEDURES

h. HEALTH EMERGENCIES

In emergency situations, direct service staff members will be prepared to act quickly to ensure the health and well-being of each child. All contracted Direct Service staff members are required to maintain current first aid and pediatric CPR certification.

In the event of any health emergency, teachers will notify the Director, Family Advocate, Education Coordinator and the Health Coordinator immediately. Immediately following the emergency situation, fill out the injury/accident report. Give the parent a copy at once; file one copy in the child's file; and send the original to the Health Coordinator for the Director's signature. The Health Coordinator will direct the form to the appropriate office and retain a file copy.

Procedure

NEVER leave an ill or injured child or staff person alone. Remain calm and reassure the victim. Stay at the scene and give immediate First Aid as necessary. Send someone to bring another adult to the scene. Do not move a severely injured or ill person except to save a life.

Seek medical assistance from:

Emergency Medical Services Dial 9-1-1

- Preferred medical or dental provider listed on the *Child Release & Emergency* form.
- Local Hospital or clinic
- Poison Control Center - 1-800-222-1222

- Give all important information slowly and clearly:
 - o Your name
 - o Your address
 - o The child's age
 - o The nature of the problem

To make sure you have given all the necessary information, wait for the other party to hang up first.

Arrange for transportation of the injured person by ambulance, parent, or other such vehicle. Early Head Start employees never transport Early Head Start children.

Send the *Child Release & Emergency Contact* form with the child.

Emergency Ambulance Transportation (911) is needed for:

- Respiratory distress - difficulty or lack of breathing
- Choking
- Bleeding - severe
- Burns - serious, or covering a large part of the body
- Heart concerns - deterioration of blood circulation
- Shock - including allergic reaction to insect bites, or food
- Poisoning
- Head, neck, or back injury - also injury to large bones (arms, legs)
- Loss of consciousness
- Seizures - complicated by lack of breathing, or lasting for more than 5 minutes. If a child has a known seizure disorder, refer to his/her Emergency Protocol (*Health Care Plan*).
- Motor vehicle accidents
- Drowning
- Smoke inhalation
- Any other situation that is life threatening

Contact parent/guardian as listed on child's emergency form. For staff, contact the Administrative Office; administrative staff will make notification of emergency contact.

Be sure that a responsible adult from the center stays with the child until a parent takes over. This will require accompanying the child in the ambulance if necessary. **Make sure the class ratio is maintained.**

Do **not** give aspirin or other medications unless directed to do so by the Poison Control Center or emergency physician.

of Injury	First Aid
Toothache	Rinse the mouth vigorously with warm water to clean out any debris. If swelling is present, place towel wrapped cold compress to the outside of the cheek. Do not use heat. Call the parent to take the child to the dentist.
Object Wedged	Do not try to remove the object, call the parent to have child taken to dentist or physician immediately.
Knocked-Out Tooth	Place tooth in clear tap water or wrap in a clean wet cloth. Do not clean the tooth. Call the parent to take the child to the dentist immediately.
Broken Tooth	Try to clean dirt or debris from injured tooth with warm water. Place towel wrapped cold compress on face next to the injured tooth to minimize swelling. Call parent to transport child to the dentist immediately.
Bitten Tongue or Lip	Using protective gloves, apply direct pressure to the bleeding area with sterile gauze. If lip is swollen apply cold compress. If bleeding doesn't stop readily or if bite is severe, call 911 to transport child to

	hospital emergency room immediately.
Fractured Jaw	If fracture is suspected, immobilize jaw (triangular bandage, handkerchief, towel) and call 911 to transport the child to the hospital emergency room immediately. Suspect neck or spinal injury.

i. DENTAL EMERGENCIES

Notify the Family Advocate, Education Coordinator and the Health Coordinator. Fill out the injury/accident report and Insurance Statement. Give the parent a copy immediately; file one copy in the child's file; send one copy to the Health Coordinator for signature. The Health Coordinator will file that copy and will document the injury and staff response on the master injury log.

Procedure Title:	Emergency Evacuation		
Procedure Number	9.5	Effective Date:	October 1, 2018
Policy Title Reference:	Emergency Evacuation		
Sub procedures	<ul style="list-style-type: none"> a. Emergency Evacuation b. Emergency Evacuation of Children with Special Needs 		
Regulation References:	45CFR 1302 .47(b)(4)(i) (G & I); 1302.47(b)(7)(i)-(ii)		
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

Every CCP center will develop a site-specific Emergency Evacuation Plan.

DEFINITIONS

SCACAP: South Carolina
Association of Community Action
Partnerships CCP: Child Care
Partner

PROCEDURES

a. EMERGENCY EVACUATION PROCEDURE

In the case of a phone call threat, the person answering the call will signal another staff person to call 911.

If emergency personnel notify Early Head Start that the Early Head Start building must be evacuated, staff will immediately begin the evacuation process:

- o The program will have an evacuation crib, which will be used during evacuation. Assigned staff will be responsible for infants to be placed in the crib for evacuation.
- o Non-mobile infants will be carried by assigned staff while, toddlers/mobile infants who walk well will be guided by assigned staff.
- o Infants and toddlers will be comforted as much as possible by the staff.
- o A designated staff member will notify all classes to evacuate the building.
- o A designated staff member will post a notice on the entrance door indicating the location where the children have been taken.
- o Teachers will take the class list and First Aid backpack with student emergency information with them when they leave the center.
- o Everyone will leave the building and assemble at a designated place where students, volunteers, and staff will be counted.
- o When everyone has been accounted for, teachers will lead the students to a predetermined safe location. This safe location will be within walking distance, but more than 300 yards from the center.
- o Teachers will keep students calm by involving them in a quiet activity such as reading or story-telling, coloring, or songs and finger play.
- o A designated staff member will lock all doors and remain at the school to assist the police or emergency

personnel. They will rejoin students and staff as soon as possible after law enforcement or emergency personnel take charge of the building.

- o If the evacuation is to last longer than 30 minutes, parents will be notified that they need to pick-up their child. (Refer to Emergency Closure Policy)
- o Students and staff will return to the Early Head Start building only after receiving permission from law enforcement or emergency personnel.
- o A letter will be sent home after class informing parents of the circumstances surrounding the evacuation, the way it was explained to children, and informing parents of any adverse reactions their child may have had during the evacuation. Parents will be offered assistance in working with children's fears by providing access to the Early Head Start Mental Health Consultant.

b. EMERGENCY EVACUATION OF CHILDREN WITH SPECIAL NEEDS

Each program will establish and implement written emergency evacuation procedure for children with disabilities.

Procedure

- In addition to meeting the above requirements, the following must be met for children with special needs:
- The program will have an evacuation crib, which will be used during evacuation. Assigned staff will be responsible for infants to be placed in the crib for evacuation.
- Non-mobile infants will be carried by assigned staff while, toddlers/mobile infants who walk well will be guided by assigned staff.
- Infants and toddlers will be comforted as much as possible by the staff.
- One staff person will be assigned to each child who needs assistance and will be responsible for the evacuation of such child during evacuation.
- Once alerted, the assigned staff will follow the evacuation routes, which will be clearly marked and posted so that the path to safety outside is unmistakable. This is part of the safety checklist.
- One assigned staff will check all available areas for children before leaving the building and a number check will be done to ensure children with special needs as well as all children present are with staff members and safe. The same assigned staff member will collect any necessary equipment needed, such as respirator or other health related equipment for the children with special needs.

Procedure Title;	Medical Conditions and Short-Term Exclusion Due to Illness		
Procedure Number	9.6	Effective Date:	October 1, 2018
Policy Title Reference;	Medical Conditions and Short-Term Exclusion Due to Illness		
Sub procedures	<ul style="list-style-type: none"> a. Exclusion Due to Illness b. Head Lice c. Contagious/Communal Diseases d. Medical Conditions 		
Regulation References:	45CFR1302.47(b)(4)(i)(a); 1302.47(b)(7)(iii)		
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates;			

POLICY

Children or adults with symptoms of communicable disease will be excluded from the classroom until they are no longer contagious and there is no risk of disease transmission. If the condition has not been professionally diagnosed, and is suspected, the parent will be asked to come and pick up their child and will be encouraged to contact their primary health care provider for diagnosis. A medical clearance from a health care practitioner may be necessary for the child or adult to return to the classroom.

DEFINITIONS

N/A

PROCEDURES

a. EXCLUSION DUE TO ILLNESS

Children or adults with symptoms of communicable disease will be excluded from the classroom until they are no longer contagious and there is no risk of disease transmission. If the condition has not been professionally diagnosed, and is suspect, the parent will be asked to come and pick up their child and will be encouraged to contact their primary health care provider for diagnosis. A medical clearance from a health care practitioner may be necessary for the child or adult to return to the classroom.

Per SC Statute 44-29-10, "any person or entity that maintains a database containing health care data must report [to SC DHEC) all cases of persons who harbor any illness or health condition that may be caused by ... epidemic or pandemic disease, or novel and highly fatal infectious agents and might pose a substantial risk of a significant number of human fatalities or incidents of permanent or long- term disability." These conditions, indicated on the SC List of Reportable Conditions as *Immediately or Urgently Reportable*, must be reported to the local health department. **Diseases do not have to be confirmed to be reported - actions to prevent further spread of disease may be necessary while confirmatory tests are pending**

Procedure:

In order to prevent the spread of disease, all adults and parents will wash their hands in accordance with the SCACAP EARLY HEAD START PROGRAM General Hygiene Policy.

Children and adults will be excluded from the classroom based on the following guidelines:

School and Childcare Exclusion List:

A Quick Reference for Parents of Children

Not an all-inclusive list. For complete list please see attachment *Health Care School and Childcare Exclusion List: Official School and Child Care Exclusion List of Contagious or Communicable Diseases-DHEC.*

Chicken Pox / Varicella

Children with chicken pox may return with a **parent note** once all of the sores and blisters are dried or scabbed over. If there are no scabs, the child may return to school or childcare when no new sores appear for 24 hours.

Diarrhea

For *most kinds* of diarrhea (defined as 3 or more loose stools in 24 hours):

- o **Children in 5th grade or younger** should stay home until diarrhea stops for 24 hours, or until a health care provider clears the child to return to school. Your child can return with a **parent note**.
- o **Exclude children of any age and staff with uncontrolled diarrhea or stools that contain blood or mucus:** unless symptoms are associated with a non-infectious condition (e.g., IBS or Crohn's Disease). Return is permitted when symptoms are resolved or medical evaluation indicates that inclusion is acceptable.
- o **For diapered children or students of any age who require assistance with personal hygiene:** exclude for 2 or more diarrheal episodes in a school or program day if the frequency or nature of the diarrheal episodes challenges the ability of the caregiver(s) to maintain sanitary techniques and/or conditions (diaper spillage or accidents in toilet trained children):
- o ***Campylobacter*, Enteropathogenic *E.coli* (EPEC), Enterotoxigenic *E. coli* (ETEC), *Cryptosporidium*, *Giardia*, *Norovirus*, *Rotavirus*, and most types of *Salmonella*:**
Your child may return with a **parent note** after diarrhea stops for 24 hours.
- o ***E. coli*0157:H7 and other Shiga Toxin Producing *f. coli*(STEC):**
For all ages do not allow recreational water activities (pools, splash pads, water tables, etc.) until 2 weeks after diarrheal symptoms stop.
- o **Children in childcare and students in kindergarten** must have 2 back to back tests taken at least 24 hours apart test negative for *E. coli*0157:H7. If antibiotics were prescribed the stool cultures must be collected at least 48 hours after antibiotic completion. A **health care provider** must clear the child to return to school or childcare.

***Salmonella Typhi* (Typhoid fever):**

Children of any age must be out of school or childcare until the diarrhea stops and 3 lab tests taken at least 24 hours apart test negative for *Salmonella Typhi*. If antibiotics were prescribed the stool cultures must be collected at least 48 hours after antibiotic completion. A **health care provider** must clear the child to return to school or childcare.

***Shigella*: Children of any age are excluded for *Shigella*:**

• **Children in childcare and students in kindergarten** must be removed for 24 hours or more after diarrhea has stopped and at least one stool culture is negative. If antibiotics were prescribed the tests must be collected at least 48 hours after antibiotic completion. A **health care provider** must clear the child to return to school or childcare.

Fever only

Keep your child home for a fever of 101 degrees or higher by mouth or 100 degrees or higher if taken under the arm. Your child can return to school or childcare with a **parent note** when the fever is gone for at least 24 hours without the use of fever reducing medications. Please note: An infant 4 months of age or younger with a fever (100.4 F) should receive medical attention.

Flu, Influenza or Influenza-Like Illness (ILI):

{ILI is defined as an oral temperature of greater than 100°F with a cough and/or sore throat/or which there is no other known cause}

A child will be excluded for a fever of 100 degrees with cough and/or sore throat. Your child can return to school or childcare with a **parent note** when the fever is gone for at least 24 hours without the use of any fever reducing medications.

Hand, Foot, and Mouth Disease:

Children with hand, foot, and mouth disease should be out of school or childcare while they have fever, above normal drooling, trouble swallowing, or are too sick to do normal school or childcare activities. Your child may return with a **parent note**.

Head Lice:

Children with crawling lice or with nits (eggs) 1/4 inch or closer to the scalp may be sent home at the end of the day, if head to head contact with other children can be avoided. Otherwise, they may be sent home immediately. Your child may return with a **parent note** after their first treatment with a facility-approved lice removal product, if there are no active lice crawling on your child's head.

The school or childcare should check your child's scalp for any newly hatched lice 7-10 days after treatment. If any are present, your child will have to be removed and retreated for lice in order to come back to school or childcare. (See Additional Head Lice Specific Policy Elsewhere in this guide (9.6 **B.**))

Haemophilus influenza Type B (Hib):

Children with a Hib infection are excluded until cleared by a **health care provider** to return to school or childcare.

Hepatitis A:

Children are excluded until 1 week after the start of illness or jaundice. The child may return with a **medical note** 1 week after the start of the jaundice.

Impetigo:

Your child may return after receiving antibiotics for 24 hours, as long as the sores have stopped oozing and are starting to get smaller, or if the sores can be covered completely with a watertight bandage. A **parent note** is needed to return to school or childcare.

Measles (Rubeola):

Children with measles can return with a **medical note** 4 days after the rash begins, if they have no fever and feel well enough to participate in regular school or childcare activities.

Meningitis:

A child with signs of meningitis (high fever, rash, stiff neck) must remain out of school or childcare until a **health care provider** provides a medical note stating that the child may return.

Mouth Sores:

Exclude young children for sores, including mouth ulcers and blisters, inside the mouth associated with uncontrolled drooling, unless the child's health care provider states that the child is noninfectious. A **parent note** is required to return.

Mumps:

Children with mumps can return with a **medical note** 5 days after the beginning of swelling.

Pink-eye / Conjunctivitis:

Exclude symptomatic children who have fever, severe eye pain, purulent drainage or are too sick to participate in routine activities. Your child may return with a **parent note**.

Rash with fever, behavioral changes or other symptoms:

Exclude children with rash until a health care provider has determined that the illness is not a communicable disease. A **medical note** is required to return.

Ringworm:

Children with **ringworm of the scalp** must remain out of school or childcare from the end of the day until they have begun treatment with a prescription oral antifungal medication. Your child may return with a **parent note**.

Children with **ringworm of the body** must remain out of school or childcare from the end of the day until they have begun treatment with a topical antifungal medication. Your child may return with a **parent note**.

RSV (Respiratory Syncytial Virus):

Exclude younger children with RSV if the child has a fever or if the child is too sick to participate in activities with other children and staff. Your child may return with a **parent note**.

Rubella / German Measles:

Keep your child home until 7 days after rash starts. The child may return with a **medical note**.

Scabies:

Keep children with scabies out of school or childcare until treatment/medication has been completed (usually overnight). A **medical note** is required to return.

Shingles:

Keep children home who have shingles sores or blisters that cannot be covered. Your child may return with a **parent note** once the sores are dried or scabbed.

Skin Infections from Staph or Strep (includes MRSA) or Herpes Gladiatorum:

Children may attend school or childcare if the sores are covered with clothes or dressings, and if the drainage does not come through clothes or dressing.

Strep Throat/ Streptococcal Pharyngitis:

Your child with "Strep throat" can return to school or childcare with a **medical note** 24 hours after starting antibiotics, if there is no fever.

Tuberculosis (TB):

Keep children with active TB home until the health care provider treating the TB writes a **medical note** that says that the child is no longer contagious.

Vomiting:

Keep young children home when vomiting has occurred 2 or more times in a 24-hour period, or for vomiting and fever (101 or higher). All children should stay home for any green or bloody vomit. If the child is vomiting and also has not urinated for 8 hours the child should stay home. Your child may return with a **parent note**.

Whooping Cough / Pertussis:

Children with whooping cough can return to school or childcare with a **medical note** after completing 5 days of antibiotics.

If there is an outbreak of disease in your child's school or childcare, DHEC may change the exclusions found in this document in order to stop the spread of disease. If your child has not received immunizations to protect against diseases like Measles, Mumps, Rubella (German measles), or Chickenpox, your child may need to be removed from school or childcare if there are cases of these illnesses in the school or childcare.

Your Health Coordinator will provide more information if there is an exposure or outbreak.

OK to Attend

Children with the following conditions do not have to be excluded from school or out of home childcare, if they feel well enough to participate in regular activities:

- Canker Sores
- Chronic Hepatitis B or C
- Colds or coughs, without fever or other signs of illness
- Cold Sores
- Croup
- Cytomegalovirus (your child may need to stay out of PE and sports)
- Disease spread by mosquitos: Malaria, West Nile Virus
- Diseases spread by ticks: Babesiosis, Ehrlichiosis, Lyme Disease, Rocky Mountain Spotted Fever, Tularemia
- Ear Infection
- Fifth Disease
- HIV infection
- Mononucleosis (your child may need to stay out of PE and sports)
- **MRSA**, if child is only a carrier
- Pinworms
- Rash without fever or behavior change
- Roseola, once the fever is gone
- Thrush
- Urinary Tract Infection
- Warts
- Yeast Diaper Rash

Help your child stay healthy and ready to learn.

We hope that your child never has to miss school or childcare because of illness. The best protection from disease is prevention. You can help prevent many illnesses by making sure your child receives immunizations and by making sure your child washes his or her hands often.

**DHEC/Bureau of Disease Control
Division of Acute Disease Epidemiology
2600 Bull Street Columbia SC 29201
Phone: 803.898.0861/Fax:803.898.0897**

b. HEAD LICE

Procedure:

1. Head Lice should be suspected if:
 - a. Small grayish eggs (nits); about the size of sesame seed are seen close to the scalp. The nape of the neck and the crown of the head are usually the best areas to notice these.
 - b. Tiny bugs (lice) crawling the hair. Bite marks and/or scratch marks on the scalp.
 - c. Intense itching of the scalp leading to frequent scratching.
2. Head lice are contagious. Children should be encouraged NOT to share hats, scarves, combs and brushes. Staff center will not use any headsets, helmets or other headgear that cannot be disinfected. Use of tumbling mats may be curtailed when several cases of head lice are occurring.

3. If there is a problem at a center or in a specific classroom, children should place outdoor clothing in a plastic, drawstring bag. The bag can then be placed on a hook so coats etc., do not touch each other. Alternatively, individual containers can be used to place on shelves.
4. Children with head lice may be excluded from school. Students with crawling lice or with nits (eggs) 1/4 inch or closer to the scalp may be sent home *at the end of the day, if head-to-head contact with other children can be avoided. Otherwise, they may be excluded immediately.*
5. Child may return with a **Parent Note** after their first treatment with a school-approved lice removal product, if there are no active lice crawling on your child's head. Children must be "nit free" before returning to the classroom. After treatment, the child can return to the center to be checked, but must be accompanied by a parent or caregiver.
6. SCACAP EARLY HEAD START Health Services staff should check your child's scalp for any newly hatched lice 7 days after treatment. If any are present, your child will have to be retreated for lice in order to come back to school.
7. Routine head checks of all children are required and may be completed randomly. Siblings and close playmates of an infested child should also be checked for head lice.

Resources:

South Carolina Department of Health and Environmental Control Exclusion Policy

c. CONTAGIOUS/COMMUNAL DISEASES

Per SC Statute 44-29-10, "any person or entity that maintains a database containing health care data must report [to SC DHEC] all cases of persons who harbor any illness or health condition that may be caused by ... epidemic or pandemic disease, or novel and highly fatal infectious agents and might pose a substantial risk of a significant number of human fatalities or incidents of permanent or long-term disability." These conditions, indicated on the SC List of Reportable Conditions as *Immediately* or *Urgently Reportable*, must be reported to the local health department. **Diseases do not have to be confirmed to be reported -- actions to prevent further spread of disease may be necessary while confirmatory tests are pending**

Procedure:

1. Health Services Manager will ensure that Center Directors post current SC DHEC List of Reportable Conditions as well as the SC DHEC Child Care Exclusion List.
2. Using various means of communication, SCACAP EARLY HEAD START Health Services staff will inform parents/guardians of situations and/or symptoms that would exclude their child from attending class related activities.
3. If a child is in attendance when symptoms are discovered, parents/guardians will be notified immediately and will be requested to remove the child.
4. The child will be excluded from class related activities until symptoms subside or written permission from a medical care provider indicates it is safe for the child to return.
5. SCACAP EARLY HEAD START Health Services staff will assist parents/guardians as needed to obtain the necessary information, supplies, and/or services required to ensure the child's timely return to the classroom.
6. SCACAP EARLY HEAD START Health Services staff will consult with SC DHEC regarding outbreaks or clusters of symptoms related to communicable diseases.

Resources:

<http://www.scdhec.gov/health/disease/reportables.htm>

Current South Carolina Department of Health and Environmental List of Reportable Conditions
Parent Handbook

d. MEDICAL CONDITIONS

Using information from parents/guardians and health care providers, SCACAP EARLY HEAD START Health Services will support each child's individual medical plan for allergy, asthma or other chronic medical condition.

Procedure:

Allergies, asthma or other chronic medical conditions identified by parent/guardian and verified by primary health care provider will be documented on the physical examination form. The child's physician will be asked to complete a Child Health Plan form.

1. All children with an allergy, asthma or other chronic medical condition must have written documentation from a health care provider. A Child Health Plan form must be accompanied by the child's Health Care provider's documentation. The center will follow the Health Care provider action plan for that child.
2. If separate instructions are provided, attach documentation to the medical action plan form.
3. If a food allergy is identified, the parent/guardian and Health Services staff will meet to address the allergy and develop plan of action. If the parent/guardian cannot attend a meeting, a phone call to the parents will be made by the Health Services staff to initially complete the Child Health Plan form.
4. A copy of the completed Child Health Plan is placed in child's file.
5. For food allergies forward copy of documentation from health care provider to designated food service personnel.
6. For food allergies forward a copy of the child's current emergency information to the SCACAP EARLY HEAD START Health Services.
7. Food allergies and substitutions must be posted in the classroom so that information is readily available to SCACAP EARLY HEAD START staff.
- 8. REMEMBER EPI PENS HAVE EXPIRATION DATES and should be checked when received by parents and Health Services staff to ensure medication is current. Parents/Guardians should be notified as expiration date approaches so that new medication can be sent to the center.**
9. Food allergies and substitutions will be handled according to the nutrition policy and procedure using the Child Health Plan. Please refer to nutrition procedures for instructions.
10. If medication is needed during class time, SCACAP EARLY HEAD START staff is to refer to the procedure for dispensing medication.
11. A classroom staff and one backup center staff member in contact with the child should be trained in emergency procedures (including CPR) and every day care of the child.

Procedure Title:	Medication Administration		
Procedure Number:	9.7	Effective Date:	October 1, 2018
Policy Title Reference:	Medication Administration		
Sub procedures	N/A		
Regulation References:	45CFR1302.47(b)(4)(c);1302.47(b)(7)(iv)		
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

No SCACAP employee or CCP contractor employee will administer any medication or perform any medical procedure to any child in the Head Start environment without a properly completed Medication Authorization form. In-service training by a qualified health care practitioner may be required.

Whenever possible, medication will be administered, and medical procedures will be performed at the child's home, by the child's parent, before or after school. Medication will be given at school only when the student's health would be compromised by not getting the medication during school hours or medical procedures **being** performed during school hours.

No staff member will be responsible for administering the first dose of any medication. The child must have already experienced taking the medication at home.

DEFINITIONS

SCACAP: South Carolina
Association of Community Action
Partnerships CCP: Child Care
Partner

PROCEDURES

Any medication administered to a child during their care in Early Head Start shall be done in a manner following the procedures set forth below.

Procedure:

These procedures apply to both prescribed and over the counter (OTC) medications (diaper ointments, Neosporin, creams, etc). Medication is defined to mean all drugs, whether prescription or "over the counter".

1. Written, signed, and dated permission is required from the parent/guardian and is to be placed in the child's file.
2. Medication must be sent in its original container and have child protective caps. All prescription medication must be kept in the original container bearing the original pharmacy label and the child's name A copy of written, signed, and dated prescribed instructions from health care professional must be provided.
3. All medications shall be used only for the child for whom the medication is labeled.

4. All medications (except emergency medications) are to be placed in a locked container under proper conditions of sanitation, temperature, light, and moisture. If refrigeration is required, medications must be kept refrigerated in a locked box.
5. Medications brought in to the center for adult use must be stored separately from children's medications. The storage area should be inaccessible to children.
6. Rescue Medications (Inhalers & Epinephrine Pens) must accompany the child at all times (i.e. playground, study trips, bus, etc.). They also must be readily available in the classroom but out of the reach of children at all times.
7. A medication log is to be filled out by the staff person who is giving the medication to the child. This log must contain the date, time of medication or distribution, staff initials and side effect if any. Any changes in the child that may be a result of the medication must also be noted and reported to the parents or caregivers.
8. A trained staff member and at least one back-up staff member **will be** responsible to administer, handle, and store all medication. Training for use of special equipment will be arranged for staff on an as needed basis.
9. Parents/guardians shall be encouraged by staff to administer children's medication prior to or after their care in Early Head Start if the prescribed dispensing orders allow for such a schedule.
10. Get instructions from the parent on how the child takes medication at home, perhaps mixed with a small amount of applesauce. If tablet, **give** a drink of water first to moisten mouth. Do not give medication with essential foods such as milk or orange juice. The child may associate the food with the medication and refuse to drink milk or juice in the future.

AUTHORIZATION TO ADMINISTER MEDICATION

No prescription or over-the-counter medication will be administered at Early Head Start unless written authorization from the child's doctor and parent or legal guardian is on file. This authorization form gives permission for program staff to administer medication as directed to the child listed below.

****All prescription medication must be kept in the original container bearing the original pharmacy label and the child's name****

FYI**

An Early Head Start Teacher will notify the Health Coordinator whenever an Early Head Start student is required to take a prescription (or nonprescription) medication at school. A Teacher or other staff member will be designated to administer the medication and will go over the procedure with the Health Coordinator. A health care practitioner may be called in to do an in-service training for the classroom staff involved.

Procedure Title:	First Aid Supplies and Emergency Information		
Procedure Number	9.8	Effective Date:	October 1, 2018
Policy Title Reference:	First Aid Supplies and Emergency Information		
Sub procedures	N/A		
Regulation References:			
Forms:	III		
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

Every Head Start classroom will have a well-supplied first aid kit readily available on site. First Aid Backpacks will be available for use on the playground and on outings away from the site and must be taken on fieldtrips and outdoors when children are on the playground. Each kit must be accessible to staff members at all times, but will be kept out of the reach of children. First aid kits will be restocked after use, and an inventory will be conducted at regular intervals.

DEFINITIONS

SCACAP: South Carolina
 Association of Community Action
 Partnerships CCP: Child Care
 Partner

PROCEDURES

To adequately prepare for medical and dental health emergency situations, first aid supplies and emergency information must be easily accessible and visible in all classrooms. First aid kits/bags must be restocked after use and an inventory conducted at regular intervals and emergency contact information kept on hand.

Procedure:

1. A readily available well-stocked first aid kit must be present in every classroom and contain at a minimum the following items:
 - Band-Aids
 - Tissue/Paper Towels
 - Non-latex Gloves
 - Plastic bags
2. Portable first aid kits must be taken on all outings that occur away from the classroom.
3. Classroom teachers will indicate any items needed on their Classroom Health & Safety Checklist which is submitted to Center Directors weekly. The Center Director or classroom designated staff will supply items that need restocking.
4. Each classroom will have an Emergency Information binder. The binder will be clearly labeled in a manner that will enable easy identification. Each binder will contain the following information:
 - Current Enrolled Children
 - List of food and medication allergies
 - Emergency Consent/Contact for Enrolled Children

- Signed Authorization to Pick-up Child

- Child Health Care Plan (If Applicable)
- Other information deemed necessary by center director

5. Teachers will take the Emergency Information binder and First Aid Kits during all emergency evacuations and drills.

6. Early Head Start classrooms' First Aid Kits will be inventoried twice a year by the Health Services staff. Teachers will maintain complete kits at all times by restocking Immediately after use.

Resources:

Classroom Health and Safety Checklist
Health & Safety Screener

Procedure Title:	Health and Safety Inspection/Injury Prevention		
Procedure Number	9.9	Effective Date:	October 1, 2018
Policy Title Reference:	Health and Safety Inspection/Injury Prevention		
Sub procedures	N/A		
Regulation References:			
Forms;	III		
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP will "ensure that staff and volunteers can demonstrate appropriate safety practices; and foster safety awareness among children and parents by incorporating it into child and parent activities." - Head Start Performance Standard 1304.22(d)(1) & (2)

Injuries often are the result of a mismatch between a child's abilities and activities, unsafe conditions in the environment, or lack of adult supervision. EHS staff will seek to prevent injuries by providing a safe environment, reduce or eliminate hazards, practice consistent adult supervision, and teach children, parents, and staff members about safety.

DEFINITIONS

SCACAP: South Carolina
 Association of Community Action
 Partnerships EHS: Early Head
 Start

PROCEDURES

SCACAP Early Head Start will ensure the health and safety of children and staff in the classrooms/play yards by conducting inspections of each classroom and play yard.

Procedure:

1. The Health Services staff will perform bi-annually health and safety inspections and note findings on an inspection form. Recommendations for the corrections to the areas of concern, including timeframes for completion, will be noted on the record.
2. Play yards and classrooms are to be inspected on a daily basis by classroom staff to assure safe indoor and outdoor areas are free of hazards.
3. A copy of the completed classroom inspection records will be provided to the Center Director.
4. An Action Plan will be provided for the teaching team to correct areas of concern and issues. Any issue beyond their scope of responsibility, will be referred to the custodial staff.
5. Once all areas of concern are corrected the teaching team will forward the original report documenting correction of the areas of concern to the Health Services staff.

Resources:

Health & Safety Screener
 Classroom Health and Safety Checklist

Playground Safety Checklist

Procedure Title;	Security, Emergency Preparedness and Closure		
Procedure Number	9.10	Effective Date:	October 1, 2018
Policy Title Reference:	Security, Emergency Preparedness and Closure		
Sub procedures	N/A		
Regulation References,			
Forms,	III III		
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

CCP staff will ensure that the school premises are secured from unauthorized access. All classrooms will be locked during class time and playground gates will be latched. One door in each classroom will be accessible while children are being dropped off and picked up before and after class; a staff person will monitor the entry and exit of children and parents during this period of time. Parents and other authorized individuals may knock at the door and will be admitted to the classroom after being identified by a staff member.

Under extraordinary circumstances, the center and playground may be completely locked down, with children and adults kept inside the locked building. This would happen when local circumstances require extra precautions or if notified by local police departments of hazardous circumstances that could jeopardize the safety of children and adults during school hours.

Each CCP center will establish procedures for canceling class in an emergency situation and assign responsibility for notifying children's parents/caregivers, and for notifying the EHS Director.

The decision to cancel class and/or close the center may be made based on weather conditions, problems with the building that would make occupancy unsafe or uncomfortable, or other unforeseen circumstance.

DEFINITIONS

SCACAP: South Carolina
Association of Community Action
Partnerships CCP: Child Care
Partner

PROCEDURES

To ensure the safety of children, staff and volunteers, the program will observe the building emergency preparedness plans.

Procedure:

1. The emergency preparedness plan is reviewed with all staff at the beginning of each year.
2. Practice drills are performed and documented by center director.
3. Volunteer content training covers the emergency preparedness plan.
4. Parents are informed about emergency preparedness policy/procedures during the year.
5. Health Services staff and Center Directors are responsible for ensuring that the inventory of emergency preparedness items is maintained and that the items are replenished when used or the expiration date is reached.

Fire Safety and Emergency Preparedness

1. All centers shall comply with the regulations and codes of the State Fire Marshall.
2. In the event of natural disaster or unscheduled closing of a center, the capacity maybe exceeded temporarily to accommodate the displaced children. The Center Director shall notify the Department of Social Services of the situation and maintain appropriate staff-to-child ratio at all times.
3. The facility shall have an up to date written plan for evacuating in case of fire, a natural disaster, or other threatening situation that may pose a health or safety hazard. The facility shall also include procedures for staff training in this emergency plan.
4. Staff orientation shall include training on the evacuation plan. The plan must include a posted evacuation route, the procedures followed during evacuation, and an alternative destination.

Fire Safety Drills Procedures:

1. Required once a month for each classroom in a center
2. Each center will use fire detector alarm during fire drills
3. Evacuate building to a consistent meeting location
4. Take first aid and attendance record with you.
5. Have a system for knowing that all children and staff are out of the building.
6. Have a signal to return to the building.

Earthquake / Tornado Emergency Preparedness

1. Drills should be conducted throughout the year.
2. The basics of earthquake responses are:
 - If staff and the children are indoors, everyone should move away from windows and glass areas. Everyone should get under a table or other solid object and cover their heads.
 - staff must consider how infants will be moved and protected in the event of an earthquake.
 - If staff and the children are outdoors, stay outdoors. Move to an area clear of trees, buildings, and power lines.
 - When the shaking stops, stay alert. Aftershocks are common. If you notice gas, fire, or exposed electrical wiring, move the children to safety. Take the first aid backpack and attendance record out with you.
 - Be prepared to access the Disaster Kit, if necessary.
3. The basics of tornado responses are:
 - Move away from windows and glass doorways
 - Go to the innermost part of the building
 - Move away from materials and furniture that could fall
 - Account for all the staff and children by taking attendance
 - Use head tuck position to protect from flying objects/debris
 - If using evacuation crib, cover children with a blanket for protection against flying objects/debris

Bomb Threat

If you receive a bomb threat:

- Keep the person talking as long as possible (pretend to have difficulty hearing, or to not understand what they are saying).
- If possible, make notes of everything that is said. Write a note to another staff person to call 911 while on the phone. Try to gather as much information from caller as possible.
- Do not touch, or move a suspicious package or suspicious device.
- Begin Evacuation Procedures.

Evacuation

Evacuate only if it is the safest option (fire/explosion) - or if there has been an evacuation order from authorities:

- Evacuate in a safe and orderly manner:
- Attempt to bring emergency contact forms, first aid kit and disaster kit - **if there is enough time**

- Move away from the building a distance of at least 500 feet.
- A team member must assure that they have a list of all children in your care. If possible - place name tags on children.
- Close, but do not lock doors.
- Turn off all electronics, including computers.
- As you evacuate, check store rooms, break rooms, etc. to ensure no one is left behind.

Electrical Outrage

- **NEVER** touch a fallen power line. Call the power company to report fallen power lines.
- If electrical circuits and equipment have gotten wet or are in or near water, turn off the power at the main breaker or fuse on the service panel. In those cases-- do not turn the power back on until electrical equipment has been inspected by a qualified electrician.
- Do not burn candles for light during a power outage. Always use flashlights or other battery-operated lights instead of candles.
- **Food storage during power outage:** limit access to refrigerator and freezer during power outage to assure that the temperatures stay within safe zone for food storage. *IF TEMPERATURE GOES ABOVE 45 DEGREES FOR 2 HOURS- THE FOOD IS NO LONGER SAFE AND MUST BE DISCARDED.*

Active Shooter Violent Person

Active shooter incidents usually start quickly and without warning

Happening Now:

- The more distance you can put between yourselves and the shooter, the better.
- Try to be a moving vs a non-moving target.
- You may try and secure the room you are in or go to a near-by room that can be secured. Close blinds, turn off all radios, etc. Your goal is to keep the shooter from entering the room.
- Quietly discuss with others in the room what you will do if the shooter enters the room. If that happens, do not "duck and cover", and become a passive target. If possible, try to get away.

Lock Down:

- Staff may initiate a shelter in place. Teams should be aware of their shelter in place and "lockdown" procedures.
- Do NOT set off the fire alarm in a lock down.
- If fire alarm goes off while in lock down, assess situation before leaving shelter.

Medical Emergency

Examples of a medical emergency are: loss of consciousness, difficulty breathing, lack of breathing, chest pain, severe bleeding, Seizures (if no underlying seizure disorder), confusion, head injury, chemical or heat burn, poisoning, head or eye injury, broken bones, or spinal injuries, choking.

In the case of medical emergencies - staff must always Call 911 First.

- Once 911 has been contacted- follow 911 dispatcher instructions.
- Do not move person unless he/she is in danger. If needed, move the unaffected children- rather than moving the injured person- especially if there is risk of spinal cord injury.
- Render first-aid or CPR until EMS personnel arrive.
- After EMS has arrived:
- Notify emergency contacts for affected children or staff.
- Refer to Childhood Emergencies Guide (posted with this plan) as needed.

Flood

FAMILIARIZE WITH THESE TERMS TO IDENTIFY A FLOOD HAZARD

Flood Watch: Flooding is possible. Await further information and guidance from management.

Flash Flood Watch: Flash flooding is possible. Be prepared to move to higher ground; listen to NOAA Weather Radio, commercial radio, or television for information.

Flood Warning: Flooding is occurring or will occur soon; if advised to evacuate, do so immediately.

As part of Disaster Planning it is very important to know whether there are any Flash Flood risks at your site: Is this site near a river or stream that has potential for Flash Flooding?

If you must prepare to evacuate due to a Flood, you should do the following:

- Tune in to Radio or TV for information.
- Secure your building. If you have time, bring in outdoor furniture. Move essential items to tables or shelves.
- Turn off utilities at the main switches or valves if instructed to do so. Disconnect electrical appliances. Do not touch electrical equipment if you are wet or standing in water.

If you have to leave your building, remember these important Flood Evacuation tips:

- Do not walk through moving water. Six inches of moving water can make you fall. If you have to walk in water, walk where the water is not moving. Use a stick to check the firmness of the ground in front of you.
- Do not drive into flooded areas. If floodwaters rise around your vehicle, abandon it and move to higher ground if you can do so safely. You and the vehicle can be quickly swept away.

Driving Flood Facts

The following are important points to remember when driving in flood conditions:

- Six inches of water will reach the bottom of most cars causing loss of control and stalling
- A foot of water will float many vehicles.
- Two feet of rushing water can carry away most vehicles including sport utility vehicles (SUV's) and pick-ups.
- Listen for news reports to learn whether the community's water supply is safe to drink.
- Avoid floodwaters; water may be contaminated by oil, gasoline, or raw sewage. Water may also be electrically charged from underground or downed power lines.
- Avoid moving water.
- Be aware of areas where floodwaters have receded. Roads may have weakened and could collapse under the weight of a car.
- Stay away from downed power lines, and report them to the power company.

Kidnapping

If a child is taken from your care without the authorization of their custodial parent or guardian, staff must call 911 immediately and report a possible kidnapping. Staff then must follow the directions of law enforcement on how to proceed.

If a child is missing from center, staff must call 911 immediately. **After 911 has been called administrative staff must be contacted as soon as possible.**

Hazardous Materials/Accidents

Programs that are close to an Interstate highway or an active railway are at increased risk of Hazardous Materials incidents

Listen to local radio or television stations for detailed information and instructions. Follow the instructions carefully.

IF THERE IS A HAZARDOUS MATERIALS INCIDENT- FOLLOW THIS GUIDANCE:

- If you are asked to evacuate, *do so immediately.*

- If you are caught outside stay upstream, uphill, and upwind! In general, try to go at least one-half mile (usually 8-10 city blocks) from the danger area. Do not walk into or touch any spilled liquids, airborne mists, or condensed solid chemical deposits.
- If you are requested to stay indoors
- Close and lock all exterior doors and windows. Close vents, fireplace dampers, and as many interior doors as possible.
- Turn off air conditioners and ventilation systems. In large buildings, set ventilation systems to 100 percent recirculation so that no outside air is drawn into the building. If this is not possible, ventilation systems should be turned *off*.
- Go into the pre-selected shelter room. This room should be above ground and have the fewest openings to the outside.
- Seal the room by covering each window, door, and vent using plastic sheeting and duct tape.
- Use material to fill cracks and holes in the room, such as those around pipes.

Severe Weather

- If transportation warnings happen rapidly and result in an inability to transport children safely home, teaching staff should be prepared to provide "shelter-in-place" until the weather has improved enough to allow for safe transport of children.
- Staff should - inventory shelter supplies and assure that there is enough food, water and blankets to make it through the night. If not - staff should immediately communicate with administrative managers to make arrangements to have supplies delivered to the site.
- Open flames must not be used for lighting or heat. Flashlights and blankets are available for those purposes.
- Refer to electrical outage section as needed.

Resources:

SCACAP EARLY HEAD START Site Emergency Preparedness Plan

FIRE PLAN

1. Remain calm
2. Evacuate anyone in immediate danger
3. Sound alarm-call out "**CODE RED**" and location.
4. Report the fire to fire officials stating, "fire at CDC."
5. Use a portable fire extinguisher if it is safe to remain in building
6. Close all doors and windows
7. Evacuate children and staff to nearest exit away from the fire to an area well away from the building
 - A. As soon as the fire is discovered, start evacuating the children out the building. All children and staff should exit through the doors leading outside. Once outside, exit out the gates and into the parking lot away from the building.
 - B. The Director will check the building for any children who may have strayed from the group.

- C. Teachers will take attendance log, first aid kit and emergency files out.
 - D. Director will take the staff time sheets as well as visitors' sign in/out sheet.
8. The director will account for children, visitors, and staff by checking attendance log, time sheet and visitors' sign in/out.
9. Reassure children of their safety and administer first aid if needed.

Procedure Title;	Universal Precautions - Blood Borne Pathogens		
Procedure Number:	9.11	Effective Date:	October 1, 2018
Policy Title Reference:	Universal Precautions - Blood Borne Pathogens		
Sub procedures	N/A		
Regulation Reference:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP recognizes that staff and students incur risk of infection and illness each time they are exposed to blood and/or other potentially infectious materials. While the risk to staff and students of exposure to body fluids due to casual contact with individuals in the school environment is very low, SCACAP regards any such risk as serious.

Consequently, SCACAP directs adherence to universally recognized precautions. Universally recognized precautions require that staff and students approach infection control as if all direct contact with human blood and body fluids is known to be infectious for HIV, HBV, and/or other blood borne pathogens.

All EHS employees will receive annual blood borne pathogens training. These employees, the child's own parent(s), and qualified emergency personnel are the only people authorized to deal with situations involving blood or bodily fluids in the Head Start classroom, on CCP property or on field trips.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

PROCEDURES

SCACAP Early Head Start Program will provide a safe environment for children and staff members through use of an Exposure Control Plan. The plan is based upon OSHA Blood Borne Pathogen Standard, 29 CFR 1910.1039 and CDC recommendations. Potential exposure to blood products exists to some degree due to the risk for accidents along with greater exposure to infectious diseases. Therefore, all body fluids are harmful and Universal Precautions will be used regardless of lack of evidence of infection.

All Early Head Start Staff members will be trained on Blood Borne Pathogens/Universal Precautions annually.

Definitions:

Blood Borne Pathogens: Pathogenic microorganisms that are present in human blood and can cause disease in humans. These pathogens include the Hepatitis B virus (HBV) and the Human Immunodeficiency virus (HIV).

Engineering Controls: Controls that isolate or remove the blood borne pathogens hazard from the workplace.

Exposure Incident: Direct exposure (contamination) to the eye, mouth, other mucous membrane, non-intact skin or needle/lancet stick with blood or other potentially infectious materials that may result during the performance of an employee's duties.

Occupational Exposure: The potential that exists to have an exposure incident as a result of performing an employee's duties.

Potentially Infectious Materials: One of the following:

- Body fluids: semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pleural fluid, pericardial fluid, peritoneal fluid, amniotic fluid, saliva, sputum, urine, blood
- Any unfixed tissue or organ (other than intact skin)
- Blood, organs, and tissues from animals and cultures and solutions containing HIV or HBV

Regulated Waste: Liquid or semi-liquid blood or other potentially infectious materials; contaminated items that would release blood or other potentially infectious materials if compressed; items that are caked with dried blood or other potentially infectious materials and are capable of releasing these materials during handling; contaminated sharps; and pathological and microbiological wastes containing blood or other potentially infectious materials.

Procedure:

1. It has been determined by the Occupational Health and Safety Administration (OSHA) that child care workers who render first aid or medical assistance as part of their job duties are covered by the Blood Borne Pathogens Standard. In addition, the Dept. of Health and Human Services, Administration of Youth and Families memorandum dated 8/27/93 states that all Head Start staff including volunteers, who are in direct contact with children, are covered by the standard.
2. Employees considered being at special risk for occupational exposure will be identified as the situation demands. For instance, staff who supervise a child who is an aggressive biter, could, depending on circumstance, be considered at special risk. Likewise, a diabetic child needing daily finger sticks to test blood sugar levels would also be considered at special risk. Children whose behavior increases the exposure risk will be incorporated into a classroom plan for that child.
3. The Exposure Control Plan will be reviewed regularly. Modifications to the plan will be made as situations and legislation warrant.
4. Training will be performed and engineering controls will be enforced in an effort to reduce employee exposure in the workplace.
 - SCACAP Early Head Start employees will receive Blood Borne Pathogen training upon assignment and annually thereafter, with exception of the Administrative staff and their assistants. Administrative staff and their assistants will be trained upon assignment and will be retrained only if the job description should change or legislation deems it necessary.
 - All center based staff will be required to have successfully passed infant and child CPR and First Aid Training.
 - The employer will provide hand washing facilities that are readily accessible to employees. When this not feasible, employees will be provided with antiseptic hand cleaner and paper towels or antiseptic towelettes. Disposable gloves will also be made available and discarded when contaminated, torn or punctured.
 - Food and drink will not be kept in refrigerators, freezers, cabinets, or on countertops where blood or other potentially infectious materials are present. In addition, applying cosmetics or lip balm and handling contact lenses are also prohibited in work areas where there is reasonable likelihood of exposure to potentially infectious materials.
5. If an employee is accidentally exposed to a child's blood the following actions should be taken.
 - Promptly cleanse exposed skin areas with soap (antimicrobial) and water. If not available, the employee should use an antimicrobial gel with paper towels or an antibacterial towelette. The employee should get to an area with soap and water as soon as possible.

- Immediately wipe up blood spills and clean surface areas with a multi-surface disinfectant/decontaminate. Gloves must be worn.
- If the exposure was direct contact as per the definition of exposure incident, an appointment with the employer's designated physician or clinic needs to be scheduled for an assessment of need for further action. This assessment will be completed within 48 hours. It will be at the physician's discretion and judgment, based on details of each Individual exposure incident, as to whether further testing for HBV or HIV will be performed. The employee may choose to have the evaluation and testing performed by their personal physician, but should get approval from the Executive Director or HR, prior to scheduling the appointment.
- Identify which child was the source of the blood exposure (if known).
- The employee must then complete an Employee Injury/Exposure Report and turn it in immediately to Human Resources.
- The employee must also report the exposure to the Center Director.
- The Health Services Manager will make a determination whether the exposure is to be declared an exposure incident, and if this is the case, contact HR to schedule the medical appointment for the employee. (See complete post-exposure procedure under #9.)

6. OSHA requires employers to perform an exposure determination concerning which employees may incur occupational exposure to blood or other potentially infectious materials. The exposure determination is made without regard to the use of personal protective equipment. This exposure determination is required to list all job classifications in which all employees may be expected to incur such occupational exposure, regardless of frequency. In the Early Head Start Program, the following job classifications are in this category:

Category I	Exposure anticipated in normal routine of job: nurse, nurse practitioner, family advocate/family services assistants, and health services
Category II	Only occasional exposure anticipated in normal routine of job: teacher, instructional aide, and disability assistant
Category III	No exposure anticipated in normal routine of job, however, exposure may occur if emergency is encountered: administrative staff, volunteer, and business office personnel

7. Multiple procedures have been developed to minimize or eliminate occupational exposure.

- **Universal Precautions:** Employees will adhere to the practice of Universal Precautions to prevent contact with blood and other potentially infectious materials. All blood or other potentially infectious material will be considered infectious **Blood Borne Pathogens** regardless of the perceived status of the source individual. (Refer to the Policy: Universal Precautions.)
- **Engineering Controls:** One of the primary purposes of this plan is the use of engineering controls to minimize or eliminate employee exposure to blood borne pathogens. The following engineering controls are utilized in the Early Head Start Program:
 - a) Hand washing facilities are readily available for use by the staff.
 - b) Where hand washing facilities are not readily accessible, antimicrobial hand cleanser and clean towels or towelettes may be used and hands should be washed with antibacterial or antimicrobial soap and water as soon as possible.
 - c) Employees will carry "fanny packs" or have their classroom First Aid Kits with them when on field trips and playground activities, as well as any activities which require leaving the immediate area of the classroom. Fanny packs and First Aid Kits will contain paper towel and/or tissue, antimicrobial hand cleanser and other protective equipment.
 - d) Sharps containers will be made available at any time finger stick procedures are performed. Containers for contaminated sharps will be leak and puncture resistant and properly labeled with biohazard warning signs. The sharps containers will be placed in adult accessible locations and never in a location where a child can easily reach it.

e) The above controls will be monitored and maintained on a regular schedule by the Health Services Staff.

- **Work Practice Controls**

SCACAP EARLY HEAD START will implement necessary work practice controls to eliminate or minimize staff exposure. Controls will be examined and maintained or replaced as appropriate on a regular schedule to ensure their effectiveness. The Health Services Advisory Committee and the Policy Council will review control effectiveness.

Controls will include but are not limited to the following:

a) **Gloves:**

1. Nonporous gloves are to be worn in the following situations:

- When coming into contact with blood, skin and mucous membrane, cuts or any open skin lesion.
- When changing diapers or other clothing soiled with urine or feces.
- When examining a child's mouth and teeth.
- Anytime it is necessary to clean a spill of blood, urine, feces or vomit.

2. Nonporous gloves are to be used for only one child or one procedure, then discarded. Gloves are to be removed from the inside out.

b) **Hand washing:** Employees shall wash their hands with soap and running water as soon as possible after removal of gloves or other personal protective equipment. (Refer to hand washing as described above and Policy: Hand washing)

c) **Removal of contaminated personal protective equipment:** Any employee wearing personal protective equipment shall remove the equipment upon leaving the work area and shall place the equipment in the area or container designated for storage, washing, decontamination or discard. This equipment or clothing will be double-bagged while wearing gloves and disposed of per Universal Precautions Policy.

d) **Handling disposable sharps:** Contaminated sharps are not to be recapped, manipulated, or removed by hand unless no alternative is feasible or is necessary for a specific medical procedure. Any recapping of needles shall be performed with a one-handed technique. As long as product availability allows, lancets will be individual, self-enclosed, safety lancets. Contaminated needles and lancets will be immediately disposed of in an approved sharps container.

e) **Eating, drinking, and hygiene:** Eating, drinking, applying cosmetics, or handling contact lenses is prohibited in work areas where potential exposure could occur. Smoking is also prohibited.

f) **Minimizing splashing, spraying:** All procedures involving blood or other potentially infectious materials shall be performed in such a manner as to minimize splashing or splattering of droplets.

g) **Clean up of spills:** Blood or other body fluid spills will be promptly wiped up. The surface area will then be cleansed with a multi-surface disinfectant/ decontaminate per product directions for use. Gloves must be worn.

h) **Handling clothing:** Contaminated clothing, which includes items that have been soiled with blood or other potentially infectious materials, shall be handled with caution, and gloves must be worn. Contaminated clothing will be promptly placed in a plastic bag, sealed and placed in a second plastic bag.

i) **Overseeing work practice controls:** The family services assistant, health services, licensed vocational nurse, registered nurse and safety inspector.

j) All personal protective equipment used at this facility will be provided without cost to employees. Personal protective equipment will be chosen based on the anticipated exposure to blood or other potentially infectious materials. Micro-shields will be provided for CPR. Nonporous gloves will be provided for use prior to any first aid exposure. They will also be stocked in each classroom First Aid **Kit**. Extra gloves may also be obtained from the Center Director/Health Services staff if any employee feels that extra gloves need to be available in their area.

- **Housekeeping Controls:** Maintaining the schools/centers in a clean and sanitary condition is a critical part of minimizing and eliminating occupational exposure. A regular cleaning schedule will be maintained by classroom staff. Toys, tables, cots and cribs will be cleaned on a regular basis. All Early Head Start staff will follow the policies for Universal Precautions and Infection Control.

8. All employees who have been identified as having a potential for exposure to blood or other potentially infectious materials will be highly encouraged to receive the Hepatitis B vaccine. Employees are referred to their physicians or Eau Claire Cooperative Clinics. The vaccination program is presented during orientation.
- OSHA will consider it a 'D' minus violation carrying no penalties if employees who administer first aid as a collateral duty to their routine work assignment are not offered the Hepatitis B vaccine until they give aid involving blood or other potentially infectious materials. OSHA will allow employers to offer Hepatitis B vaccines to certain employees within 24 hours of a possible exposure rather than offering pre-exposure vaccination. The Early Head Start Programs have determined to offer the Hepatitis B vaccine as follows:
 - a) Category I and II employees will be offered the vaccinations pre-exposure (See #6 for definition)
 - b) Category III employees will be offered the vaccinations post-exposure (See #6 for definition)
9. Post-Exposure Evaluation and Follow-Up: If an employee incurs an exposure incident, it should be reported immediately to Human Resources and Health Services staff. The employee must complete an Occupational Exposure Incident Report and the incident is to also be reported as a work-related injury and recorded on the OSHA log 200. All employees who incur an exposure incident will be offered post-exposure evaluation and follow-up in accordance with the OSHA STANDARD. If the employee is already **covered under the Hepatitis B vaccination series**, he/she is not required to complete a first aid incident report. The follow-up is to include the following:
- Documentation of the route of exposure and the circumstances related to the incident.
 - If possible, the identification of the source individual and, if possible, the status of the source individual. The blood of the source individual will be tested (after consent is obtained) for HIV/HBV infectivity.
 - Results of testing of the source individual will be made available to the exposed employee with the exposed employee informed about the applicable laws and regulations concerning disclosure of the identity and infectivity of the source individual.
 - The employee has the right to refuse either or both. An accredited laboratory shall perform the blood testing at no cost to the employee. The designated accredited laboratory this facility be determined by Human Resources and Health Services.
 - The employee will be offered the option of having their blood collected for testing of the employee's HIV/HBV serological status. The blood sample will be preserved for at least 90 days to allow the employee to decide if the blood should be tested for HIV serological status. If the employee decides prior to that time that testing will be conducted, then the appropriate action can be taken and the blood sample discarded.
 - The employee will be given appropriated counseling concerning precautions to take during the period after the exposure incident. The employee will be given information on what potential illnesses to be aware of and to report any related experiences to appropriate personnel. The exposed employee will be offered a medical evaluation within 12 weeks of the exposed incident.
 - The employer shall provide the employee with a copy of the evaluating healthcare professional's written opinion within 15 days of completion of the evaluation. Such evaluation shall be included in the employee's medical record, and in keeping with confidentiality, the opinion shall be limited to the following information:
 - a) The healthcare professional's determination of administering the Hepatitis B vaccination and whether or not the employee has received such vaccination.
 - b) Confirmation that the employee has been told about any medical conditions resulting from exposure to blood or other potentially infectious materials which require further evaluation or treatment.
- Confidential medical records are kept on an employee involved in an exposure incident. Human Resources shall be responsible for setting up and maintaining these records. The records shall include the employee's name, Social Security number, copy of the employee's Hepatitis B vaccination status (including dates of the vaccinations, and signed consent or declination forms), copies of the evaluation of the examination, medical testing and follow-up procedures which took place as a result of the exposure incident and a copy of the healthcare professional's opinion. Medical records regarding an employee's exposure incident shall be kept for the length of employment, plus 30 years. Employee medical records are confidential and are not to be release except with the employee's written consent or in accordance with federal and state law. The medical records shall be maintained separately from the employee's personnel file.
10. Signs and Labels: The most obvious warning of possible exposure to blood borne pathogens is biohazard labels. SCACAP Early Head Start uses appropriate biohazard labels on sharps containers and red bags to identify contaminated waste.

Procedure Title	Classroom Sanitation		
Procedure Number	9.12	Effective Date:	October 1, 2018
Policy Title Reference:	9.12 - Classroom Sanitation		
Sub procedures	N/A		
Regulation References:			
Forms:	III		
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

Regular cleaning and disinfecting will occur to reduce germs and the spread of disease in the classroom. Limited assistance with janitorial services will be provided for every center, however it is the responsibility of CCP classroom staff to ensure that sanitation of the classroom and bathrooms occur prior to children entering the classroom each day, and that toys and other surfaces are cleaned and disinfected on a regular basis. It is likewise the responsibility of the CCP to ensure that all food service equipment and surfaces are maintained appropriately.

DEFINITIONS

SCACAP: South Carolina
 Association of Community Action
 Partnerships CCP: Child Care
 Partner

PROCEDURES

Regular cleaning and disinfecting will occur to reduce germs and the spread of disease in the classroom. Each classroom Teaching Team will observe and ensure that daily/weekly sanitation of the classroom occurs through the use of a daily/weekly checklist. It is the center staff's responsibility to ensure general cleaning of classrooms and bathrooms at end of each day. In the event that it appears that the classroom/bathroom has not been thoroughly cleaned/sanitized, **teaching teams are responsible for ensuring that sanitation of the classroom and bathrooms occurs prior to children entering the classroom each day.**

Definitions

"**Clean**" means to remove surface dirt using a product suitable for the surface being cleaned.

"**Disinfect**" means to kill surface germs using a disinfecting cleaner, chlorine bleach solution, or other disinfectant.

Procedure

1. Staff will dispose of waste, trash, and garbage in containers specifically designated for that purpose.
2. Toys used by infants and toddlers must be disinfected and sanitized daily. It is recommended for preschool children toys be disinfected and sanitized weekly.
3. More frequent disinfection is necessary whenever there is an outbreak of illness or when toys become dirty or have been placed in child's mouth.
4. Throughout the day, any toys to be cleaned need to be collected in separate containers.
5. Toys can be disinfected and sanitized using one of the following methods:
6. Cloth toys and play clothing can be placed in washing machine with detergent and hot water and machine dried.

7. Use of bleach water to sanitize, wash toys first with soapy water, rinse thoroughly and dipped in sanitizing solution then air dry.

All classroom toys and other materials (non-mouthed) that are used on a daily basis should be disinfected at least once a week. Small plastic toys should be cleaned with hot soapy water and rinsed with plain water, then sprayed with the bleach-water solution, let stand for ten (10) minutes, and wiped clean.

Do not mix cleaners such as bleach and ammonia; doing so will release harmful fumes.

Post Guidelines for Cleaning and Disinfecting Surfaces in the Kitchen and Classroom.

Toys

- Washable toys will be selected for the classroom whenever possible.
- Small toys that go into a child's mouth will be gathered up and cleaned and disinfected at least daily.
- Larger toys will be cleaned weekly. If obviously dirty they will be cleaned immediately.
- Dress-up clothes will be washed and dried by machine weekly. Hats will be washed and/or disinfected weekly (daily if necessary).
- Cloth or stuffed toys will be washed twice a year or as needed by machine, using hot water and laundry detergent. Toys may be dried in a hot dryer or air-dried. Do not return toys to the play area until they are completely dry. Cloth or stuffed toys may require occasional surface cleaning
- Small toys will be cleaned by submerging in warm, soapy water and scrubbed as needed; rinsed; disinfected by submerging in tested chlorine bleach solution; air dried.
- Toys that can't be submerged, either because they are too large or have parts that will retain water, will be cleaned with warm soapy water and scrubbed; then sprayed to disinfect with tested chlorine bleach solution between washings.

Dishes, Kitchenware and Kitchen Surfaces

- Three sinks of water will be used when washing dishes, and kitchen implements. Dishes will be washed in hot, soapy water, rinsed in clear hot water, and placed in a solution of approximately 1 tablespoon bleach in 1-gallon water or run through mechanical dish sanitizer.
- Use chlorine test paper to determine strength of the solution. The test strip should indicate 50 to 100 parts per million.
- Dishes will be air dried in rack; do not use towel to dry dishes or cover dishes. Dishes must be dry before storing.
- Use glass or acrylic cutting boards for all cutting and slicing. Clean as for dishes and soak 2 minutes in chlorine solution or run through mechanical dish sanitizer.
- Food preparation areas will be cleaned and disinfected before and after preparing and/or serving food.
- Cupboards where food is stored will be cleaned regularly, at least weekly, and spoiled food, discarded immediately.
- The refrigerator will be cleaned on the inside and the outside at least weekly, and spoiled food discarded immediately.
- Range tops will be disinfected before and after use and washed as needed during food preparation. Ovens and overhead hoods should be cleaned at least weekly, more frequently if needed.
- Tables and other eating surfaces will be cleaned and disinfected before and after each meal

Other Surfaces

- Clean Toothbrush Storage Units regularly in accordance with Dental Hygiene Policy.
- Counter tops, shelves and toy storage areas will be cleaned when soiled, at least weekly.
- Garbage cans will be cleaned and disinfected at least weekly.
- Other surfaces will be cleaned and/or disinfected as indicated in the following chart

Guidelines for Cleaning and Disinfecting Surfaces

Dishes and Kitchen Area				
	Clean	Disinfect	Frequency	Comments
Dishes and Kitchenware	X	X	After every meal	Wash in hot, soapy water, rinse in hot water, rinse in chlorine solution.
Toothbrush Storage Units	X	X	Weekly	Allow toothbrushes to air dry in individual storage drawers.
Food Preparation Areas	X	X	Before and after food preparation	Use chlorine solution.
Food Storage Areas	X		Weekly	Dispose of spoiled food.
Refrigerator	X	X	Weekly, at least	Inside and outside; dispose of spoiled food.
Range Top	X	X	Before and after use	Clean as needed during use.
Oven and Overhead Hood	X		Weekly, at least	
Filters	X		Quarterly	Replace as needed.
Tables and Eating Surfaces	X	X	Before and after each meal	Use chlorine solution.
Toys and Dramatic Play Props				
Small toys that go in to the mouth	X	X	Daily weekly and as soiled	Submerge to clean. Rinse. Submerge to disinfect Rinse and air dry
Larger toys	X	X	Weekly	
Dramatic play clothes	X		Weekly	Machine wash and dry. Can harbor eggs from head lice.

Hats	X	X	Weekly or as needed	Use plastic or washable hats. Wipe with chlorine bleach solution or machine wash and dry.
Cloth or stuffed toys	X		2 x a year or as needed	May require surface cleaning between washing. Wash in machine, air dry or dry in dryer.
Other Surfaces (Custodial Duties)				
Counter tops, toy shelves & storage	X		Weekly	
Hand washing sinks	X	X	Daily, between classes	
Faucets and handles	X	X	Daily, between classes	Clean then disinfect or use disinfectant cleaner.
Surrounding counters	X	X	Daily, between classes	
Toilet bowls	X	X	Daily, between classes	Use disinfectant toilet bowl cleaner.
Toilet seats	X	X	Daily, between classes, if soiled, immediately	Clean, then disinfect or use a disinfectant cleaner.
Flushing handle	X	X		
Door knobs	X	X		
Bathroom floors	X			
Changing table	X	X	After each use	
Garbage cans	X		Weekly or when soiled	
Floors	X		After each class or when soiled	Wash.

Procedure Title:	Hand Washing		
Procedure Number:	9.13	Effective Date:	October 1, 2018
Policy Title Reference:	9.13 - Hand Washing		
Sub procedures	N/A		
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

EHS staff, parents and volunteers working in the classroom will teach and model excellent preventative hygiene practices in order to lower the risk of spreading communicable diseases.

DEFINITIONS

SCACAP: South Carolina
 Association of Community Action
 Partnerships EHS: Early Head
 Start

PROCEDURES

In an effort to prevent the spread of illness and disease by using effective hand washing methods, Early Head Start staff, parents and volunteers working in the classroom will teach and model preventative hygiene practices. Staff and children's hands should be washed many times throughout the day, especially before and after meal times, before and after water and messy play, after diapering/ toileting, after outdoor play, after wiping noses or anytime hands look or smell unclean. Hand washing is the single best way to cut down on the spread of germs.

Procedure:

1. Children, staff and volunteers will wash their hands with liquid soap and running water, and using friction.
2. Children, staff and volunteers will wash the palms, back of hands, between fingers, wrists, and under the fingernails.
3. Hands will be rinsed off with a stream of running water and dried with disposable paper towels.
4. Infants with no head control will have their hands washed by staff or a volunteer using a wipe. The staff will clean between the fingers, back of hands, palms, and wrists and rinsed off with a stream of running water. Disposable paper towels will be used to dry hands and then discarded.
5. Children, staff, parents and volunteers must wash their hands with soap and running water, at a minimum, during the following times:
 - a. After diapering, toilet use or assisting a child in changing soiled clothing;
 - b. Before and after eating, handling foods, or any other food related activity;
 - c. Whenever hands are contaminated with blood or other bodily fluids;
 - d. After handling pets or other animals;
 - e. After outdoor play;
 - f. After wiping noses and mouths.

g. Upon completely entering classroom

6. Staff and volunteers must also wash their hands with soap and running water, at a minimum, during the following times:
 - a. Before and after giving medication or before and after medical procedures;
 - b. Before and after giving first aid;
 - c. After wiping noses, mouths, bottoms, or sores;
 - d. After cleaning surfaces soiled with body fluids (blood, mucus, vomit); and
 - e. After taking off disposable gloves.
7. If necessary staff may use antibacterial gel, but it is not encouraged as a routine procedure and must be kept away from children.
8. Clear, simple hand washing procedures will be posted in all classrooms, including these steps.

Step 1 Wet hands with warm water and then add soap.

Step 2 Use friction to work up lather and wash hands for at least 20 seconds.

Step 3 Rinse well under a stream of warm water.

Step 4 Pat dry hands with a single use paper towel.

Step 5 Turn off faucet with a paper towel, if possible.

Procedure Title:	Diapering and Toileting		
Procedure Number,	9.14	Effective Date:	October 1, 2018
Policy Title Reference:	9.14- Diapering and Toileting		
Sub procedures	<ul style="list-style-type: none"> a. Diapering b. Toileting 		
Regulation References:			
Forms:	<div style="display: flex; justify-content: space-around;"> III III </div>		
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

Diapering and toileting will be implemented in a manner that is safe, secure, respectful of the child, and that enables the child to learn self-help skills.

DEFINITIONS

SCACAP: South Carolina
 Association of Community Action
 Partnerships EHS: Early Head
 Start

PROCEDURES

a. Diapering

Sanitation and hygiene procedures for diapering that adequately protect the health and safety of children served will be observed. Diapering procedures are based upon *Caring for our Children*, American Academy of Pediatrics.

Procedure:

1. Diapers shall be checked for wetness and feces, visually inspected (with gloves) at least every two hours, and whenever the child indicates discomfort or exhibits behavior that suggests a soiled or wet diaper. Diapers shall be changed when they are found to be wet or soiled.
2. Diapering will be done only in a designated diapering area. Food handling will not be permitted in diapering areas.
3. Surfaces in diapering areas will be kept clean, waterproof, and free of cracks, tears, and crevices. Changing tables should be cleaned and sanitized **after every use**.
4. All diaper checks and changes completed on site will be documented.
5. Prepare for Diapering:
 - a. Gather enough wipes to be used on the child's bottom, child's hands and staff hands. (Wipes are to be removed from the container.)
 - b. Gather a clean diaper (and change of clothes if needed)
 - c. If diaper cream (with doctor's prescribed use) is needed, place some on a paper towel to be used and do not use the tube during the diaper change.
 - d. A plastic bag if needed for soiled diaper/clothes.
 - e. Place the materials near the diaper changing table and not on the table because of contamination.
 - f. Gloves, if desired. Wash hands before putting on gloves.

6. Diapering Procedures

- a. Talk to child about where you are taking them and why.
- b. Place the child on the diaper changing table.
- c. Remove the child's clothes as needed.
- d. Open the soiled diaper. Use wipes to clean the child's bottom. Dispose of soiled diaper and wipes in hands-free trash can with lid. **(If wearing gloves, remove them at this time.)**
- e. Use a wipe to remove soil from staff's hands and dispose.
- f. Use another wipe to remove soil from the child's hands and dispose.
- g. Put on a clean diaper and redress the child.
- h. Bring the child to the sink and wash child's hands. (If they have head control. If they do not, use a wipe to clean the child's hands).
- i. Put the child back to play without touching anything else.
- j. Spray the changing table surface with soapy water solution and dry with a paper towel. (Be sure spray bottles emits a fine mist, rather than a stream.)
- k. Spray the changing table surface with bleach/water solution at a disinfectant strength and let stand for 2 minutes and then dry with a disposable paper towel, (or let air dry). (Be sure spray bottles emits a fine mist, rather than a stream.)
- l. Wash your own hands with soap and water.

7. Diaper rash should not be excluded from attendance as long as a child can participate. Meticulous hygiene practices are critical to reducing incidences of diaper rashes
8. Parents should be advised to seek health care provider's advice if child has had a raised, red raised rash for three (3) days or when the skin is broken.

b. Toileting

Bathrooms will be kept sanitized and visibly clean throughout the day and accommodations will be made for each child's individual toileting and hand washing needs.

Procedure:

1. Bathrooms with urinals will be free of odor absorbing devices that are within reach of children because they are toxic.
2. All surfaces in bathrooms must be easily cleaned and must be sanitized on an as needed and daily basis. (See Classroom Sanitation policy)
3. Bathrooms will be supplied with paper towels, toilet paper and liquid soap.
4. Accommodations will be made for any children with special needs.
5. Adaptations will be utilized to assist with the toileting needs of children with physical disabilities and when necessary an assistant will be designated to aid in this process. To prevent disease transmission portable potty chairs will not be used unless a child's condition is such that other adaptations will not safely accommodate the child. In the event that other portable potties or other adaptations are used, they must immediately be sanitized by staff following use.
6. Contents in porta-potties must be placed in toilet and flushed. Bleach and disposable gloves will be used in sanitizing adaptive toileting devices. After usage portable potties or other adaptations will be stored in the bathroom out of reach of children.
7. Teachers must have a system in place where children check in with teacher before and after going to the bathroom.

8. Toilet paper and holders, paper towels and soap dispensers will be available within easy reach of *all* users.
9. When a child cannot reach the sink and/or soap dispenser without assistance of an adult, non-slip stools will be provided to accommodate the child.
10. Staff will monitor toileting areas to insure that proper hand washing and safety is maintained in bathrooms.
11. In the event that a child has an accident and visible body fluids are present in the bathroom, staff must wear disposable gloves and wash hands after sanitizing toilets, floors and sinks soiled with any body fluids. If a child needs assistance with cleaning themselves after an accident involving a bowel movement, baby wipes may be used and discarded into a bag and secured with tie. Mops and mop buckets (limited to use in toileting areas only) are to be clean and stored outside of the classroom or in a locked closet after use.

10.0 Education and Early Childhood Development

- 10.1 Child Development and Classroom Education Approach
- 10.2 Social and Emotional Development
- 10.3 English Language Acquisition
- 10.4 Curriculum Development
- 10.5 Individualization and Transition
- 10.6 Child Guidance and Behavior Management
- 10.7 Family Role, Family-Teacher Conferences and Home Visit Philosophy
- 10.8 Attendance, Transportation and Child Release

Procedure Title:	Child Development and Classroom Education Approach		
Procedure Number. :	10.1	Effective Date:	October 1, 2018
Policy Title Reference:	Child Development and Classroom Education Approach		
Sub procedures	<ul style="list-style-type: none"> a. Classroom Approach b. Classroom Celebrations c. Screen Time 		
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

Interactions between children and adults provide opportunities for children to build trust and trusting relationships, to develop an understanding of self and others, and to encourage respect for the feelings and rights of others. All interactions between children and adults will be respectful and supportive of each child's gender, culture, language, ethnicity and family composition

SCACAP will seek to optimally nurture each child's cognitive, language, physical and social-emotional development through the establishment of environments and schedule of activities that include opportunities for experimentation, inquiry, observation, play, exploration, self-expression and pro-social interactions with both peers and adults.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

PROCEDURES

a. CLASSROOM APPROACH

SCACAP EHS CCP staff will do the following:

- Will greet each child to acknowledge their presence.
- Will demonstrate respect and caring for children in all interactions.
- Will offer reinforcement for children's efforts.
- Will actively listen to children and observe non-verbal communication.
- Will physically place themselves at the child's eye level while interacting.
- Will encourage children to talk about their feelings.
- Will use language and materials free from ethnic and gender bias.
- Will stimulate critical thinking skills and cognitive concepts by using open-ended questions.
- Will use questioning, modeling and other appropriate communication strategies.
- Will make every effort to include persons at the site who speak the primary language of each child and are knowledgeable about their heritage.
- Will provide opportunities for each child to explore a variety of sensory and motor experiences.
- Will practice primary caregiving.
- Will use *The Creative Curriculum* for planning meaningful, developmentally appropriate, and individualized lesson plans.
- Will provide a print-rich environment and encourage children's emerging interest in writing (e.g. scribbling,

- drawing, copying, writing and inventing their own spelling).
- Will use wall photos to share information using pictures and words.
- Staff will be intentional in planning activities and will extend childrens' thinking and learning by:
 - o adding new materials
 - o asking open-ended questions
 - o offering ideas or suggestions
 - o joining in their play
 - o supporting children in problem solving
- Will read from a variety of literature sources daily.
- Will share stories with children about experiences and expand on their learning.
- Will dictate drawings, and experiences of the children. (e.g. "tell me about your picture")
- Will use flannel board, puppets, songs, finger plays, books and poems.
- Will provide opportunities for children to learn new vocabulary.
- Will plan activities for labeling, classifying, sorting objects by shape, color, size.
- Will observe and discuss natural events such as seeds growing, life cycle of pets and other animals.
- Will provide a variety of hands on science and exploration activities allowing children to discover, create, and learn about problem solving and cause and effect.

b. CLASSROOM CELEBRATIONS

SCACAP EARLY HEAD START PROGRAM believes that individual family traditions strengthen the family and the community. Early Head Start values the diversity of traditions and beliefs practiced by enrolled families. Children will be encouraged to talk about family celebrations to teachers and other children. This is a way to share the children's culture and traditions with their classmates.

Because there is such diversity in tradition and beliefs already being celebrated in the home, Early Head Start has chosen to celebrate seasonal and cultural events, rather than the more traditional religious-based holidays. Parents can be involved in planning these celebrations and will be provided with guidelines for planning.

Any foods involved in classroom celebrations will be provided by the child care center and will be in keeping with program guidelines limiting salt, sugar and fat.

To ensure that the classroom is an inclusive and safe environment for all children, any exchange of gifts, cards or invitations must happen outside of the classroom or center environment.

Procedures:

Parent's involvement in curriculum and classroom activities provides parents with an opportunity to contribute to what their child learns in the classroom (or what activities are used to provide learning opportunities) and to help parent learn what is developmentally appropriate for very young children to be doing in the Early Head Start classroom. This is a valuable contribution to the program.

The teaching staff is responsible for ensuring the appropriateness of all activities and to help parents modify their suggestions, taking into consideration developmentally appropriate practices, safety, health, nutrition, social-emotional appropriateness and program policy.

Special projects may be done as one of many choices for children during free choice and may be delivered as a "thank you" or special gift to some organization or to a family member. As a literacy activity, cards can be made and letters sent throughout the year for any reason - seasons, good for you, get well, we miss you, thank you. The focus is not on a religious or non-religious holiday, but on creative expression, doing something for others, etc. The activity should be designed to enhance fine motor skills, cooperation, sharing of ideas and materials, problem solving, etc.

Parent's desire to celebrate holidays is often a reflection of their desire for their children to have parties and celebrations.

Find "common ground" issues to celebrate - changing seasons, children's achievements both individually and collectively, baby animals in spring, children's growth, the natural loss of teeth, reading books, developmental milestones... help parents come up with creative things to celebrate.

- Explain the program's approach for handling celebrations to parents at the beginning of the year. Early Head Start will provide materials for classroom activities; parents can contribute their time and energy.
- Explain to parents how children's birthdays will be celebrated - perhaps a "Special Person Day" for each child. Activities like posters, crowns, etc. will be included in the classroom curriculum - parents will be asked not to bring sugary treats or balloons, but would be very welcome to participate in classroom activities.
- Determine if you have any families who do not celebrate any events...find out what the boundaries are about that belief/practice to determine if celebrating common events would be a problem. Look for ways to make it work.

Explain to parents the difference between "dramatic play" and "costumes".

- Children will have opportunities to dress up throughout the year in the dramatic play area. Themes and props will change regularly, and parents are welcome to make suggestions and contribute ideas.
- Costumes, on the other hand, are not universally accepted, may be scary for some children, can leave some children feeling "left out" or competitive, and tend to promote inappropriate social interactions.
- Find events and opportunities for children to dress up throughout the year. Some examples are "blue day", "backwards day", or a "pajama party".

Explain Early Head Start's philosophy and regulations with regard to food served and used in the classroom.

- Early Head Start requirements limit the use of salt, sugar and fat in foods served to children. This program has decided to also serve healthier foods to adults.
- Regulations also prohibit serving foods that have been prepared and brought from home.

c. SCREEN TIME

SCACAP will limit screen time during all activities, including classroom time, home visits and at child care for Early Head Start meetings and events. We prohibit the use of passive and non-interactive technology for any children.

The American Academy of Pediatrics discourages media use by children younger than age 2 and recommends limiting older children's screen time to no more than one or two hours a day. Too much screen time has been linked to obesity, irregular sleep, behavioral problems, impaired academic performance, violence and less time for play and learning. Most children spend about 3 hours a day at home watching TV. When you add in other screen time activities, it is closer to 5-7 hours a day.

Procedure

Screen time includes all electronic media such as television, video/DVD, electronic games, computers, tablets, smart phones, digital cameras, or any other screened electronic devices. It does not include audio only media used for music or stories such as MP3 players, radios, CDs, records, or tapes.

Classrooms and Home Visits:

In all classrooms and on home visits the teacher will support limited screen time:

- Screen content must be appropriate for the ages of children, nonviolent, and culturally sensitive
- At least one alternative activity is available for children while electronic media is used
- Program's use of screen viewing encourages active child involvement
- Electronic media is not on during non-viewing time and not allowed during meals or snack time
- When electronic media is used, it is used intentionally to promote learning

- Lesson plans clearly show connection between intentionally planned screen time activities and the curriculum topic as well as individual goals for children
- Adults do not use electronic media for personal use during class time
- Staff may use electronic media for purposes of documentation for TS Gold, urgent communication with school staff or parents and other reasonable intentions
- Staff encourages families to limit screen time to fewer than 2 hours/day and model appropriate use of technology with families. Staff use technology with families that strengthens the staff-family relationship.

Procedure Title:	Social and Emotional Development		
Procedure Number:	10.2	Effective Date:	October 1, 2018
Policy Reference:	Social and Emotional Development		
Sub procedures			
Regulation References			
Forms,	III III		
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

Classroom staff will support the social and emotional development of children through the design of the physical environment and a schedule of activities that builds trust; fosters independence; encourages self-control and respect for the feelings and rights of others; and supports each child's home language, culture, and home composition.

DEFINITIONS

N/A

PROCEDURES

SCACAP EHS staff will provide training and technical assistance on best practices for social and emotional development for children, *Creative Curriculum*, *Conscious Discipline*, and ASQ: SE.

Classroom teacher teams will set clear, consistent limits and have realistic developmentally appropriate expectations based on the accepted principals of child development and based on the individual needs of the child.

Staff will implement curricula and practices through lesson plans that include *Conscious Discipline* strategies, concepts, and environmental set-up that links social emotional learning and classroom management to achieve center wide success. Activities teach self-regulation and social skills.

The EHS teachers will complete the *Ages and Stages: Social Emotional (ASQ:SE)* with families to identify strengths and growth areas through ongoing assessment of social emotional development.

Build trust: Classroom teachers will build trust by establishing primary caregiving practices in the EHS classroom. Primary caregiving is established when the EHS teacher assigns herself to four of the children in the classroom. Temperament, arrival and departure times, and family connections will be the criteria for establishing primary care groups. PLEASE NOTE PRIMARY CAREGIVING IS NOT EXCLUSIVE CARE. Continuity of Care is practiced to allow children and teachers time to establish trust and attachment. Whenever possible, children remain with the same teacher for the duration of their time in the EHS program.

Foster independence: The classroom teacher will establish consistent, classroom routines that facilitate predictability for the child and promote independence. Examples: Family style meals are implemented where children serve themselves while seated at the table with the teacher. In diapering, children will actively participate during the diaper process-holding their diaper, lifting their legs, attempting to pull up their own clothes. The teacher will assist children in brushing their teeth daily, explaining steps and supervising to make sure it is completed successfully.

Encourage self-control: Classroom teachers will provide clear and consistent expectations for children. Using Conscious Discipline strategies, teacher will use daily class experiences as learning tools to model self-control.

Encourage respect: Classroom teachers will model respect in how they speak with children, interact with children, and encourage children to use language and actions that are respectful and inclusive of people and their environment.

Be culturally sensitive: Classroom teachers will promote cultural sensitivity by inviting and including families in the classroom. They will include photographs of families and will use a variety of materials that reflect the cultures of the children represented in the classroom to promote and teach acceptance and sensitivity.

Procedure Title:	English Language Acquisition		
Procedure Number:	10.3	Effective Date:	October 1, 2018
Policy Title Reference:	English Language Acquisition		
Sub procedures			
Regulation References:			
Forms;			
SCACAP Executive Director Approval Date,	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP EHS program supports the home language and culture of every child and family. In addition, SCACAP EHS actively promotes English language acquisition for those children for whom English is not their first language, while at the same time providing books, materials, and activities that positively reflect the child's home language and culture.

DEFINITIONS

SCACAP: South Carolina
 Association of Community Action
 Partnerships EHS: Early Head
 Start

PROCEDURES

Home language support is the foundation for developing English language skills. While working with families and children who are dual language learners, classroom teacher teams will engage families in planning of activities and approaches for the child. Teachers will incorporate culturally relevant books, songs, games, and toys to help the child adjust to the learning environment. Families will be encouraged to actively participate in classroom activities to foster and promote their cultural practices.

Classroom teachers will design classroom activities to provide exposure to English language usage in an effort to increase comprehension of the English language and to provide opportunities for children to practice vocabulary in a safe and supportive setting. The activities will be individually based on the child's development.

Classroom teachers will provide labels for materials and items in the classroom using both English and the home languages of the children enrolled in the classroom as a tool for promoting comprehension and English language acquisition.

Classroom teachers will provide opportunities for group involvement in repetitive word games, rhymes, and songs in both English and the child's home language.

SCACAP EHS staff will provide ongoing training and technical assistance to support SCACAP EHS teachers in cultural sensitivity towards English language acquisition.

Procedure Title:	Curriculum Development		
Procedure Number:	10.4	Effective Date:	October 1, 2018
Policy Title Reference:	Curriculum Development		
Sub procedures			
Regulation Reference:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP EHS will follow a curriculum that is consistent with the Early Head Start Program Performance Standards and is based on sound child development principles about how children grow and learn.

SCACAP EHS shall utilize the Creative Curriculum for Infants, Toddlers and Twos (D as the basis for written educational plans. Teachers will use supplemental curriculum resources such as Conscious Discipline• to enhance learning experiences. Supplemental curriculum resources and materials will be made available for staff use in planning and developing specific activities and goals for children.

DEFINITIONS

Curriculum is defined in the Performance Standards as a written plan that includes:

- 1) The goals for children's development and learning;
- 2) The experiences through which they will achieve these goals;
- 3) What staff and parents do to help children achieve these goals; and
- 4) The materials needed to support the implementation of the curriculum.

Written plans consist of:

- 1) Specific goals and objectives;
- 2) Developmentally appropriate indoor and outdoor activities for acquiring basic cognitive, social emotional, and physical skills; and
- 3) A system for documenting children's progress in all areas of development.

PROCEDURE

Teaching staff will receive training to ensure full implementation of the *Creative Curriculum for Infants, Toddlers and Twos*• and Conscious Discipline•.

Curriculum planning is an ongoing creative process in which specific activities are adapted and developed as program staff interacts with individual children and families. The curriculum is responsive to the emergent interests and needs of children, families and the community and is used as a framework to develop activities as program staff:

- 1) Learn about the developmental levels of each child;
- 2) Identify each child's individual learning style;
- 3) Identify Individual needs and interests; and
- 4) Attempt to understand each child's and family's culture and value system.

Teachers will intentionally plan a balance of child initiated and adult directed activities daily including individual and small group activities. Daily activities are designed to be:

- 1) Comprehensive and reflective of each child's developmental level;
- 2) Reflective of the community and cultures represented in the group;
- 3) Clear in recognizing and promoting the role of the parents;
- 4) Child focused;
- 5) Built on each child's individual skills and knowledge; and
- 6) Diligent in promoting every child's self-awareness and positive self-concept.

Teachers will post weekly lesson plans in prominent spaces for families to access. This will provide an opportunity to gain families' input regarding their children's learning.

On a daily basis, teachers will intentionally plan and implement activities to support children in all areas of development:

Cognitive Development: Teachers will provide intentional learning opportunities to support cognitive development through developmentally appropriate materials (manipulatives, books etc.) and activities (building, reading etc.). Teachers will capitalize on children's natural curiosity to plan themes and lessons. Teachers will provide opportunities for hand-on learning throughout the day and build in opportunities for sensory exploration of materials.

Social-Emotional Development: CCP staff will facilitate trust building and emotional security for every child in their care by following primary caregiver and continuity of care models. Having a primary caregiver during the infant-toddler years will strengthen attachments.

Physical Development: Teachers will plan for routines and activities to support both gross and fine motor development. CCP staff will provide sufficient time, indoor and outdoor space, equipment, materials and adult guidance for active play.

Communication Development: Teachers will support the emerging communication skills of infants and toddlers by providing daily opportunities to interact with others and to express themselves freely. Teachers will plan for respectful, nurturing, meaningful language rich routines and experiences throughout the day.

Procedure Title:	Individualization and Transition		
Procedure Number:	10.5	Effective Date:	October 1, 2018
Policy Title Reference:	Individualization and Transition		
Sub procedures	a. Individualization b. Transition		
Regulation References:			
Forms:	III		
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates,			

POLICY

EHS services will be individualized to meet each child's unique strengths and patterns of development. Individualization will take place based on classroom observations, ongoing developmental assessment, and/or consultation with the family.

SCACAP will work in collaboration with families and preschool providers to ensure a smooth transition from EHS to the child's next preschool placement.

DEFINITIONS

EHS: Early Head Start

PROCEDURE

a. INDIVIDUALIZATION

SCACAP EHS CCP sites use mixed age classrooms. Teachers organize the curriculum to support the individualized needs of each child based on their age, developmental level, interests, learning styles and familial/cultural values.

Gathering Information: Teachers will gather information about each child's interests, developmental level, language, cultural background, learning style and temperament in order to individualize instruction.

Materials and Environment: Information gathered about individual children **will be** used to create learning environments appropriate for each child that promotes individual growth. Choice of materials in the classroom will reflect individual differences amongst children.

Instruction: Individualized teaching may occur during one-on-one sessions with a child, or in small groups. Individualized instruction will be embedded throughout the day during child initiated and adult directed activities.

Modifications: Teacher will modify classroom instruction based on the individual needs of each child. Modifications may include providing environmental support, modifying materials, modifying activity, providing peer support, and/or providing adult support.

Goals/Progress: EHS teachers write goals and objectives for each child using information gathered through observations, developmental screening and parent report. If a child has an Individual Family Service Plan (IFSP), the IFSP goals and objectives will be integrated into the child's classroom goals. Each weekly lesson plan will include several child goals to be targeted during the week. Teachers will use observations, child work samples, photos and reports to monitor progress on

identified goals. Information from *GOLD™* by Teaching Strategies., will be used to develop goals and objectives and to assess progress in all developmental domains.

b. TRANSITION

Transition from Early Head Start to Head Start /Preschool Overview

SCACAP EARLY HEAD START PROGRAM, in an effort to build continuity and consistency into the educational approach for young children in our communities, endeavors to maintain open lines of communication with Early Childhood Special Education, Head Start, and School District personnel. To ease the transition of children through the Early Head Start program and into Head Start or other early childhood preschool programs, activities are planned to address the specific needs of individual children and families. Appropriate records are transferred from Early Head Start to the new school or school district in accordance with (see *Student Education Record Policy*).

Procedure

Children and families are introduced to the new educational environment and personnel with the support of familiar Early Head Start staff, and individual assistance is provided on request to parents as they enroll their child in the new early childhood program.

1. Teaching teams will plan transition activities during the year. Activities may include: scheduling a parent group and inviting Head Start/Early Childhood program teachers to talk about their programs; helping parents make a list of questions to ask their child's preschool teacher; encouraging parents to visit the new school; or helping families set up visits for themselves **as a** home visit activity. Completion of activities and other relevant information will be documented.
2. On the second home visit of the program year, the teacher will verify with the family of children approaching 30 months of age which preschool each child will be attending. Transition issues will be discussed with parents during the second parent conference. The Transition Form may be completed with the parent to share child and family information with the new school.
3. For children on an *Individual Family Service Plan* (IFSP), an Early Head Start Family Advocate will arrange to attend all multidisciplinary team (MDT) meetings, *Individual Education Plan* (IEP) meetings, and other transition related meetings for children with disabilities.
4. Transition meetings, or more informal meetings, can be set up with the teacher and parent if it is believed that the transition into another setting may be difficult for a particular child or family.
5. Parents may receive copies of requested child records prior to registration in another program. Education records will be forwarded to the new program with parental permission.

Procedure Title	Child Guidance and Behavior Management		
Procedure Number:	10.6	Effective Date:	October 1, 2018
Policy Title Reference:	Child Guidance and Behavior Management		
Sub procedures			
Regulation References:			
Forms:	III		
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:	December 19, 2017		

POLICY

Child guidance and classroom behavior management will promote positive social skills, foster mutual respect, strengthen self-esteem, and support a safe, nurturing environment.

DEFINITIONS

N/A

PROCEDURE

Child Guidance and Behavior Management Overview

South Carolina Association of Community Action Partnerships recognizes that high-quality infant toddler care requires teachers who prepare themselves and the environment so that infants can learn, thrive, and interact. For care to be good, infant/toddler care teachers must get "in tune" with each infant they serve and learn from the individual child what he or she needs, thinks, and feels. SCACAP' approach to child guidance and behavior management reflects this supportive philosophy.

Particularly with infants and toddlers, behaviors considered undesirable - such as hitting and biting - are often a reflection of an unmet need or desire that the child is unable to adequately express or resolve using language and/or other problem-solving skills. Preventing these behaviors requires careful attention and planning on the part of teachers, who must be prepared to anticipate problems and carefully monitor each child's actions and emotions - stepping in to intervene and gently redirect as needed.

SCACAP Early Head Start employs a system of child guidance and behavior management that is clear and consistent, and that promotes the development of positive social skills, encourages mutual respect, strengthens self-esteem, and supports a safe and secure environment for all children and adults.

Above all else, SCACAP' Early Head Start program recognizes the crucial importance of giving tender, loving care and assisting in each infant's intellectual development through an attentive reading of each child's cues. Harsh/disrespectful language, corporal punishment, isolation, and the withholding of basic needs are all strictly forbidden in SCACAP' EHS classrooms and may lead to disciplinary action up to and including termination from the program.

Prohibited Practices:

Prohibition Against Corporal Punishment

Consistent with the federal Head Start Performance Standards, the use of corporal punishment is strictly prohibited within the SCACAP Early Head Start program. Corporal punishment is defined as the use of physical force/touch

as a form of discipline. This includes (but is not limited to) spanking, pinching, slapping, squeezing, pinching, shaking, and the pulling of hair.

This prohibition against the use of physical force/touch as a means of discipline should not be misinterpreted as discouraging physical contact between teachers and children in the Early Head Start classroom. Physical contact between teachers and children is expected as part of responsive infant/toddler caregiving. SCACAP expects, however, that ALL physical contact with children is tender and caring.

Specific care must be exercised while picking up young children, who require proper support to avoid unnecessary stress on their still developing bodies. To avoid potential injury, children must never be lifted abruptly or by the extremities (arms/legs). Care must always be taken to provide support to the heads of young infants.

Prohibition Against the Verbal Abuse/Harsh Language

It is the expectation of South Carolina Association of Community Action Partnerships that classroom verbal interactions - both among adults and with enrolled children - are consistently professional, positive and respectful. Harsh language, tones, and verbal abuse are all strictly prohibited. This includes yelling, shaming/embarrassing, or talking down to a child in any way. Name-calling, threats, ridicule, and other forms of demeaning, harsh, dismissive, or frightening language are all strictly forbidden.

Prohibition Against Isolation

The use of isolation is also prohibited. Isolation refers to separating the child from his/her normal association with classroom activities. Isolation in which the child is left totally unattended is unacceptable. Using the deprivation of meals/snacks and access to outdoor play are also forbidden.

Prohibition Against the Withholding of Food, Basic Needs, or Participation in Special Events

The withholding of food, basic needs (including comfort and restroom access), and/or participation in special events are all strictly prohibited. Punitive actions and language associated with toilet training are, likewise, inappropriate and forbidden.

Failure to adhere to the prohibitions above may result in disciplinary action by SCACAP, up to and including termination of staff and/or the cancellation of the center's status as a SCACAP Early Head Start provider. SCACAP will recommend the immediate termination of employment for any center staff member using corporal punishment.

Recommended Practices:

Positive and Responsive Behavioral Strategies

Positive behavioral strategies are proactive, responsive, and serve to teach children the skills necessary to manage their own behavior. Individual and cultural factors will be considered when planning for and providing guidance. The following guidelines will be followed in classrooms:

1. Teachers will set up safe and appropriate classroom environments that support pro-social behavior.
2. All adults will interact with children in a positive, caring, and respectful manner, modeling pro-social behaviors with each other and with the children.
3. Children will be provided with alternative choices and will be directed away from inappropriate behavior without engaging in power struggles between child and adult.
4. Teachers will always strive to anticipate problems before they escalate.
5. Schedules and routines will promote predictability and security for children; adequate time and preparation will be allowed for children to transition from one activity to another.
6. Children will be taught positive social skills through direct teaching, modeling, and through practice with competent peers.
7. Expectations for appropriate behavior will be clearly and consistently stated and appropriate behavior will be recognized through praise and encouragement.

Additional Behavioral Strategies

Use of Natural Consequences Mistakes are learning opportunities and natural consequences often help children reflect on their choices and motivate them to make changes in their future behaviors. Teachers will help students to understand the connection between their behaviors and their natural and logical consequences, which will help children learn how to be responsible for their choices.

Use of Safe Place. The teachers will set boundaries and teach skills around self-regulation and will create a safe place in the classroom that is out of the way but not isolated. If a child is exhibiting behaviors that are calling for help (unsafe, strong, upset, violent, etc.) then the teacher will provide the structure to help the child voluntarily enter the safe place. Children will be encouraged to use the safe place to calm themselves. The child will have the opportunity to identify feelings and make choices to regain control. The teacher will then help to solve the problem with a plan for how to re-enter play or classroom activity.

Problem Solving Teachers will help children reflect on their actions and then to make choices that bring successful outcomes by using problem solving strategies.

Response to Unsafe Behavior. Potentially dangerous behaviors can occur quickly and with little warning. Each center will develop an action plan for handling unanticipated behavioral outbursts that pose a threat to children or adults. This plan will enable staff to take immediate action to ensure the safety of the child and all others in the environment. For the safety of the child and staff, crisis intervention will involve gently removing the child from the situation and holding the child only long enough to get him/her to a safe place in which he or she can take time to calm down.

The plan will include the following steps, to be used as appropriate, depending on the situation: 1) identification of a safe, quiet place in the classroom where the child can be separated from the situation in question, but still under appropriate, active supervision (safe place) 2) develop a procedure of quickly removing the child from the situation so he/she can be alone under appropriate, active supervision; 3) if necessary, identify a quiet place outside of the classroom where the child can be removed from the situation, while still under the careful supervision of a qualified adult; and 4) determine a system for quietly communicating to other staff members the need to intervene, without disrupting the rest of the classroom.

Should such a situation occur, the EHS Education Coordinator and the child's parent will be contacted to discuss the incident. If need for further support is indicated, the parent, coordinators, and mental health consultant will be involved in the decision to develop a Child/Family Support plan. Consistent communication with the child's parent(s) and the appropriate program coordinator must be maintained throughout implementation of a Child/Family Support plan. Ongoing documentation and reports of the child's progress will be maintained in the child's file and shared with the parent and appropriate program coordinators.

Procedure Title:	Family Role, Family-Teacher Conferences, and Home Visit Philosophy		
Procedure Number	10.7	Effective Date-	October 1, 2018
Policy Title Reference:	Family Role, Family-Teacher Conferences and Home Visit Philosophy		
Sub procedures			
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

Parents will be actively involved in helping to develop the program's curriculum, provided with opportunities to help plan learning experiences, and in regular home visits and teacher conferences.

SCACAP believes that a partnership between families and staff best supports children in their development. Family-teacher conferences and home visits will be planned to provide a natural link between the child's family, home, and school.

DEFINITIONS

N/A

PROCEDURE

SCACAP believes that a partnership between parents and staff best supports children in their Early Head Start experience. Regular collaboration between the program and families is an expectation, to include day-to-day communication and collaboration, family-teacher conference and home visits, each of which creates a natural link between the two most powerful influences in a child's life, home and school. These also support the development and achievement of personal and family goals.

Teaching teams will schedule regular planning time together and will go on every home visit and conduct every parent-teacher conference together, except under extraordinary circumstances. This requirement is intended to ensure that the teaching teams regularly and consistently communicate essential information and together form a working, supportive relationship with the family. In the classroom with a Teacher and Family Advocate when home visits are not done together, the teacher and FA will meet regularly to share information.

Based on the Community Assessment and parent preference, SCACAP will operate a Center-Based program option that provides Early Head Start services primarily in the classroom setting, five days a week with a minimum of 240 days of school, two Home Visits and two Parent Teacher Conferences.

Prior to acceptance, an Early Head Start staff member will schedule a visit with the family in their home or in the Early Head Start center or will spend time with a parent on the phone. This is an opportunity to explain the purpose and philosophy of the Early Head Start program, answer any questions parents may have, and complete the initial paperwork to help determine eligibility for the program.

Home Visits must be completed in the home unless the family situation or safety of the staff is an issue, or if parents expressly forbid home visits. In such cases, staff will continue to work on building a trusting relationship, which over time may provide opportunities for meeting families in their homes. In exceptional circumstances, visits may be conducted outside the home; however, every effort will be made to conduct the visit in the home.

Parent Teacher Conferences provide an opportunity for staff and parents to discuss each child's growth and development,

and plan an individualized education program to meet the child's needs.

Procedure Title:	Attendance, Transportation, and Child Release		
Procedure Number	10.8	Effective Date:	October 1, 2018
Policy Title Reference:	Attendance, Transportation, and Child Release		
Sub procedures	<ul style="list-style-type: none"> a. Attendance b. Transportation c. Child Release d. Class Closure 		
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revision, Dates:			

POLICY

Children are best able to benefit from their EHS experience if they attend school on a regular basis. EHS staff will regularly discuss the importance of attendance with parents and encourage their cooperation in bringing their children to school on a regular basis. If children are absent without a parent contact for 10 consecutive days, that enrollment slot may be opened up for another eligible applicant. SCACAP will make every effort to maintain a monthly average daily attendance rate of 85%.

South Carolina Association of Community Action Partnerships does not provide transportation to Early Head Start students.

South Carolina Association of Community Action Partnerships Early Head Start staff will release children only to the custodial parent(s)/guardian(s) or those individuals listed on the *Child Release and Emergency Contact Form*.

DEFINITIONS

N/A

PROCEDURE

a. Attendance

EHS center staff will take regular attendance and communicate regarding absences with the Family Advocate daily.

b. Transportation

SCACAP does not provide daily transportation for children to and from the Early Head Start classroom, and neither funding, nor appropriate buses are available for field trips.

In cases where self-transport is an extreme financial hardship on a family, SCACAP will attempt to find a source of financial subsidy with the family to facilitate regular attendance of the child.

c. Child Release

South Carolina Association of Community Action Partnerships Early Head Start staff is authorized to release children only to the custodial parent or those individuals listed on the *Child Release and Emergency Contact Form*. If a staff member is unfamiliar with the individual attempting to pick up a child, they must ask that person to present photo identification. If in doubt, staff will always check the *Child Release and Emergency Contact Form*.

Although Early Head Start staff is expected to do everything in their capability to protect the children in our care, it is neither reasonable, nor expected that anyone put themselves in physical danger trying to prevent an unauthorized person from forcibly taking a child. Staff will be aware of potential conflicts and conduct the classroom in such a way as to limit

opportunities for unauthorized access to a child. If an individual is violent, it is in the best interest of the child and the program to let the child go and immediately call the police, giving them as much information as is available.

Procedure

If, in the opinion of a staff member, a parent's functioning appears to be impaired due to drugs or alcohol, and the parent is attempting to pick up and transport a child:

1. The staff member will try to dissuade the parent from driving and suggest that they find alternative transportation.
2. If the parent insists on driving with the child, the staff member will note the condition and behavior of the parent, the automobile's make, and color and license number and will call the police.
3. The incident will be documented and a copy of the report sent to the Family Advocate.

If a child is not picked up after class, the procedure will be as follows:

1. A staff member will remain at the center with the child.
2. The staff member will attempt to locate the parent, or one of the emergency contact people listed in the child's file.
3. If, after one hour, the child has not been picked up and/or the parent has not been located, DSS will be contacted directly or through the police department.
4. The staff member will continue to attempt to contact the parent and let them know that the child is in the care of DSS.
5. The incident will be documented and a copy of the report sent to the Family Advocate.

d. CLASS CLOSURE

SCACAP will make every effort to keep to the annual calendar as provided to parents at the beginning of the school year. Early Head Start programs are required to provide a specified number of class days each year. All classrooms are scheduled for 240 class days, 2 home visits, one enrollment appointment that can take place either in the center or in the family home, and two parent-teacher conferences. If classes must be cancelled beyond the scheduled days, make-up class days may be scheduled.

Procedure

Each center will establish a system for canceling class; responsibility will be assigned to the Center Director for making the decision to cancel class, notification of all parents and notification of the Education Coordinator and the EHS Director.

Class may be closed for the following reasons:

Weather. Class may be cancelled due to adverse weather conditions, or unsafe road conditions. Follow the closures for your local school district.

Facility Issues. Class may be cancelled due to temporary lack of basic services such as heat or water in the center.

Scheduled Staff Training. Training is generally scheduled for days when class is not in session. Staff may attend training on a regular class day if approved by the Education Coordinator. Finding a substitute is preferable to canceling class. Parents will be notified of any change in schedule at the earliest opportunity.

Personnel Issues. Early Head Start requires that at least two teachers be present in the classroom when class is in session. (See the Teacher Job Description for teacher qualifications.) If, due to circumstances beyond our control, teachers or substitutes are not available, class must be canceled.

11.0 Disability Services

- 11.1 Parental Rights
- 11.2 Transition of Children with Disabilities
- 11.3 IDEA Part C Participation and Cooperative Agreements
- 11.4 Coordination of Services
- 11.S Coordination of Mental Health Services
- 11.6 Family Services and Attendance of Children with Disabilities
- 11.7 Disabilities Service Plan
- 11.8 Recruitment, Selection and Enrollment
- 11.9 Evacuation of Children with Disabilities
- 11.10 Staffing and Training
- 11.11 Monitoring
- 11.12 Environment
- 11.13 Personnel
- 11.14 State and Federal Records Retention
- 11.15 Children with Disabilities and Developmental Delays

Procedure Title:	Parental Rights		
Procedure Number	11.1	Effective Date:	October 1, 2018
Policy Title Reference:	Parental Rights		
Sub procedures			
Regulation References:			
Forms:	III		
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP ensure that the legal guardian(s) of all enrolled children with special needs will be informed of their legal rights regarding services for their children.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

PROCEDURE

SCACAP will make every effort to ensure that the legal guardian(s) of enrolled children with special needs is/are informed of their legal rights regarding services for their child.

Procedure

1. The program will determine a parent or legal guardian by one of the following:
 - A. A natural parent who retains guardianship.
 - B. A person who has legal documentation of being responsible for the child's welfare (guardianship, power of attorney, custody agreement).
 - C. A grandparent, stepparent or foster parent with whom the child lives and who is acting as a parent that can provide legal documentation as indicated above.
2. All documentation of parental identification will be located in the family file and in the system management database.
3. Any changes in guardianship will be communicated to the Center Director who will then electronically communicate to all team members.
4. This policy conforms to the Federal IDEA regulations.
5. Parents will be notified of upcoming IFSP meetings or reviews and these notifications will be documented.

Procedure Title:	Transition of Children with Disabilities		
Procedure Number:	11.2	Effective Date:	October 1, 2018
Policy Title Reference:	Transition of Children with Disabilities		
Sub procedures			
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 201820i6
Revisions Dates;			

POLICY

SCACAP will foster smooth and positive transitions into and out of the Early Head Start program for children with disabilities.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

PROCEDURE

The SCACAP staff will foster a smooth and positive transition into and out of the Early Head Start program for children with disabilities.

Procedure

1. Planning for transition from Baby Net and/or other infant and toddler programs to Early Head Start will begin through the Individualized Family Service Plan (IFSP).
2. Collaborative agreements will be in place to facilitate transition between agencies. Parent permission to exchange information with other agencies shall be obtained in writing and if needed, a meeting will be held for all appropriate staff and volunteers to prepare for service to children with disabilities according to the individual child's needs.
3. Early Head Start will cooperate and coordinate with all other agencies providing services for children with disabilities. The classroom teacher, center director, Family Advocate, and Health Coordinator if appropriate, will attend IFSP and transition meetings.
4. Infants and toddlers with a current **IFSP** when entering Early Head Start will be provided services no later than 30 days (in compliance with **Baby Net** policy) after notifying the appropriate professionals, such as physical therapist, speech therapist, occupational therapist, nutritionist or dietitian. Together with Early Head Start staff, consultation with parents will take place and parents will be invited to observe the classroom of the child.
5. The **ERSEA** Manager will notify the Family Advocate if a child with special needs is a candidate for filling an enrollment slot. The Family Advocate will present the child's information and current diagnosis to the Health Coordinator. The EHS Teachers will include the IFSP goals in their overall goal planning with parents. Transition from Early Head Start to Head Start or other agencies will begin before the child reaches 30 months. At that time a transition form will be completed by center director and include transition plans and activities, including timelines and persons responsible.
6. The Early Head Start program will forward records, as permission is granted by the parent/legal guardian. Teachers will discuss transition plans and address transition concerns with parents in the last parent conference and/or home visits.

The transition from Early Head Start into Head Start, LEA, or other community-based preschool programs will involve the following steps:

1. Early Head Start staff will provide information to parents on the availability of Head Start services in the community, if needed.
2. For BabyNet eligible children, a referral to the LEA (Local Education Agency) will be sent by the Early Interventionist or BabyNet Service Coordinator no later than 6 months prior to the child's third birthday. With the parent's permission, pertinent records will be shared with the LEA. If agreed upon by the parent, Early Head Start staff along with parents and/or Early Interventionist will meet with the LEA no later than 3 months prior to the child's third birthday to discuss/plan transitioning activities for BabyNet eligible children. Those attending this meeting will be the parent, the Early Interventionist, the classroom teacher and an LEA representative.
3. Early Head Start staff will communicate with parents, Early Interventionist and preschool Head Start/other community-based program to discuss specific needs of the child transitioning, when necessary.
4. Family Advocates may plan a visit to Head Start for parents and children, where transitioning children will be oriented to the new environment, by participating in activities and meeting Head Start teachers.
5. Family Advocates will distribute flyers, newsletters; reminders, and information for parents, etc. related to transition issues.
6. Family Advocates will meet with parents and Head Start staff to discuss the process for transitioning from Early Head Start to Head Start as well as similarities and differences between the two programs.
7. The BabyNet Service Coordinator, Early Interventionist will update the IFSP with transition related information.

Procedure Title:	IDEA Part C Participation and Cooperative Agreement		
Procedure Number:	11.3	Effective Date:	October 1, 2018
Policy Title Reference:	IDEA Part C Participation and Cooperative Agreement		
Sub procedures			
Regulation References,			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP will ensure close collaboration between EHS and state and local early intervention agencies, and actively seek to connect children to the BabyNet (IDEA, Part C) services for which they may be eligible. The SCACAP EHS program will enter into a cooperative agreement with BabyNet to ensure the provision of these services.

DEFINITIONS

SCACAP: South Carolina

Association of Community Action

Partnerships EHS: Early Head

Start

BabyNet: South Carolina's early intervention program for infants and toddlers with disabilities and disabilities under Part C of IDEA.

IDEA: Individuals with Disabilities Education Act

PROCEDURE

SCACAP EHS in collaboration with Early Intervention agencies, will participate with BabyNet to provide services to children with special needs under Part C of Individual Disabilities Education Act. (In 34 CFR Part 300.125 Child Find, each state must identify, locate, and evaluate each child with special needs.)

Procedure

1. The EHS-CCP program will participate in Baby Net efforts by planning at regular meetings.
2. The EHS-CCP program will refer children and families to Baby Net and local therapy agencies.

Procedure Title :	Coordination of Services		
Procedure Number:	11.4	Effective Date:	October 1, 2018
Policy Title Reference:	Coordination of Services		
Sub procedures			
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date;	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Oates:			

POLICY

SCACAP will ensure that the needs of EHS children with special needs are met and appropriate services are provided in coordination with state and local early intervention agencies.

DEFINITIONS

SCACAP: South Carolina
 Association of Community Action
 Partnerships EHS: Early Head
 Start

PROCEDURE

The Education Coordinator(s) will work with the Health Coordinator and teaching staff to ensure that the needs of children with special needs are met and appropriate services are provided.

Procedure

1. For children who enter the program with developmental concerns/documented diagnosis, the Education Coordinator will be responsible informing/training staff of those children entering the program, as necessary. If there are children with health concerns and training is necessary, the Health Coordinator and teaching staff will meet with the appropriate professional.
2. The individual as assigned will track all meetings, communications, etc. in system management database.
3. Developmental screenings will be completed within 45 days of entry and any re-screens will be completed as directed by the Education Coordinator, but no later than thirty days from prior screen. Parent consent for screens will be signed and dated prior to screens. A sign in/out system will be used to access confidential information.
4. Children's individualization will be supported through IFSP goals and teacher lesson plans. These plans will indicate consistent evidence of individualization according to the goals.
5. The daily schedule will be established and posted, showing alternative periods of quiet and active play. Daily activities will include individual instruction (centers), small group instruction (read-alouds, reading extensions, and curriculum activities, etc.) and large group instruction (music and movement, greeting, morning message, etc.)
6. Children will be provided ample time for learning center play and given a signal to prepare them for transitions. Children are not required to move as a group from one activity to another.
7. Staff will adjust schedule to changes in weather or other unexpected situations in a relaxed way. Staff will be flexible to change planned or routine activities to follow needs or interests of the children. "Waiting" time between activities will be short and well managed.
8. Children with special needs will be provided adaptive techniques and utensils and will be included in all classroom activities and events. Activities, plans, and/or materials will be developmentally appropriate. Activities will provide time for children to talk to each other. Planned activities will allow adults to introduce new and interesting vocabulary and concepts to children.

9. All special procedures and dietary needs, though confidential, will be prominently posted and followed.

Procedure Title:	Coordination of Mental Health Services		
Procedure Number	11.5	Effective Date:	October 1, 2018
Policy Reference:	Coordination of Mental Health Services		
Sub procedures			
Regulation Referenes:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHSDirector Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

The SCACAP EHS Mental Health Consultant will coordinate with teaching staff to ensure that children with mental health needs receive the services they may require.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships
EHS: Early Head Start

PROCEDURE

SCACAP EHS' Mental Health Consultant will coordinate with teaching staff to meet the needs of children with disabilities by providing the necessary services.

Procedure

1. The Family Advocate will review applications and notify Education Coordinator and of any applications that indicate there is a mental health concern or need that is being addressed by an outside agency.
2. Mental Health Consultant will complete observations on-site as needed and include a written report and recommendations. When the consultant conducts a general classroom observation in a classroom, strengths and needs in the classroom environment will be assessed and reported in a written report with recommendations. The consultant will meet with staff throughout the year, which may include group, individual or phone consultations to discuss supportive strategies for families.
3. Mental Health Consultant will share information relating to any specific children from his/her initial classroom observations. In addition, she/he will review IFSP's, which have behavioral concerns for consultation and strategies. The Mental Health Consultant will be available to conduct in-home observation upon request by staff and provide follow up support.
4. At the time of enrollment or home visit, Family Advocates and teaching staff will solicit information from parents about their child's mental health. The following means will be used: interview, home visits, daily contact, IFSP, observations, Ages and Stages Questionnaire (ASQ), ASQ-SE with parent involvement, and family partnership agreement development. This information will be discussed and appropriate responses to child behaviors will be discussed with the parents. Resources and mental health information will be given to parents to better understand and support their child and family.
5. When a mental health referral is received for a child who is already on an IFSP or a referral is received for a child without an IFSP where there are concerns about additional delays the referral will be taken to Mental Health Staff. The Mental Health Consultant may participate in assessment, planning and providing support to

the teaching staff as deemed appropriate by the team.

6. The program will utilize the Ages and Stages (ASQ)-SE as the behavioral screening for children. The ASQ-SE will be administered at a home visit or in the classroom setting by the parent and teachers; the teacher will compile and assess the data, which will be maintained in the child's folder.
7. The results of the assessment will be maintained in the children's folders and shared with the parent. Re-screens will be conducted within a timely manner as directed by the Education Coordinator, but no later than 30 days from time of first screen.
8. The Mental Health Consultant will provide group and individual training as needed in the areas of identifying mental health concerns and working with children and families with mental health concerns.
9. Outside training to parents and staff may also be provided as determined necessary and/or beneficial.

Procedure Title:	Family Services and Attendance of Children with Disabilities		
Procedure Number	11.6	Effective Date:	October 1, 2018
Policy Title Reference:	Family Services and Attendance of Children with Disabilities		
Sub procedures			
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates,			

POLICY

SCACAP will work with the families of children with disabilities (or other special health considerations) to ensure that their children are enrolled, attending and receiving BabyNet services (as identified) within natural environments. It is the intent of SCACAP that each child and family receive the full benefit of the program while accommodating for individual needs as appropriate.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

P. PROCEDURE

It is the policy of SCACAP EHS to work with families to ensure their child is enrolled and receiving services under the guidance of an Individualized Education Plan (IEP), Individual Family Services Plan (IFSP), or other special health considerations, the child and family receive the benefit of the program to the fullest extent possible while having their individual needs met. This policy further defines the SCACAP effort and intent to meet the requirements of the Head Start Act and Performance Standards regarding attendance.

Procedure

When a child is enrolled in the program and has an IEP, IFSP, or special health considerations, the following will apply:

1. If a child has an IEP, IFSP, or special health consideration, the Family Advocate will document known and/or anticipated absence - whether a brief absence or an extended period - and will continue to work with the child and family as possible and appropriate during the time the child is not able to attend.
2. No child shall be excluded as a result of his or her health care needs or medication requirements. Exclusion will only occur if keeping the child in care poses a significant risk to the health or safety of the child or anyone in contact with the child and when the risk cannot be eliminated or reduced to an acceptable level. However, this exclusion would be classified as an absence as described in #3 and #4.
3. Absences related to the child's developmental/medical needs will be given a special documentation code in the attendance record. This will ensure the child's attendance is not recorded in our tracking system as a concern, nor will this individualization have an undue negative impact on the overall attendance reports.
4. If a family notifies us of an unexpected illness or appointment that results in a necessary absence due to the needs identified on the IFSP, or other special health consideration, we will treat this as noted above in #3.

5. If the program determines a family is abusing this policy, the program may, at the discretion of the EHS Director, require documentation by a physician for any future absence, as necessary. Failure to comply will result in the full implementation of the attendance policy of SCACAP EHS.
6. Parents will be informed at intake that they are expected to notify the Center if their child cannot attend the program on a school day. The notification will include why the child cannot attend and when the child will return (if known). This is a requirement.
7. Attendance will be documented and a monthly attendance report will be sent to the SCACAP EHS-CCP Director.
8. If a parent does not call in to report an absence, the absence will be considered unexcused until the parent provides the teaching staff with an explanation. This parent contact will be considered an excused absence, regardless of the reason given. However, if related to the disabilities, it will not be tracked for attendance.
9. The Family Advocate will review absence patterns weekly. Parents will be contacted when a child's attendance is considered irregular. Irregular attendance is defined as a child missing four class days in any two-week period.
10. The Family Advocate will contact the parent(s) to determine the cause of the absences. The importance of regular attendance and notification of absences will be stressed to the parent(s). Appropriate family support measures will be discussed and initiated if indicated as necessary. The classroom team will develop an action plan with the parents, listing strategies and timelines, and record this plan in the child's folder.
11. If contact cannot be made with the parent(s) or cooperation cannot be elicited from the parent, regarding attendance, an internal referral will be made requesting an attendance staffing.
12. The staffing will be scheduled with the parents (if possible) and staff members. The parents will be notified of the place and time of the meeting.
13. At the meeting, staff members and the parents, if present, will explore strategies to improve attendance. On a case-by-case basis an attendance agreement may be developed. The attendance agreement will specify the amount of class days the child can miss for the enrollment year. Exceptions may be made to this agreement in emergency situations at the discretion of the Early Head Start Director.
14. If attendance does not improve within the time limit set, the ERSEA Manager will recommend termination of enrollment to the EHS Director with documentation of the reasons for the drop. The EHS Director will review all pertinent information and make a final determination of the child's enrollment status. In the event that the decision is to drop the child from the program the EHS Director will instruct the Family Advocate to inform the parents by mail of the decision.
15. All documentation of absences, contacts with parents, and results of conferences are kept in the child's folder. The Family Advocate will ensure this information is entered correctly and completely.
16. Vacancies will be filled according to the enrollment and selection policy.

Procedure Title e:	Disabilities Service Plan		
Procedure Number	11.7	Effective Date:	October 1, 2018
Policy Title Reference:	Disabilities Service Plan		
Sub procedures			
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP will establish a disabilities service plan, updated annually, to guide the program's efforts to meet the needs of children with disabilities and include them and their families in the full range of EHS services. SCACAP will support and participate in the implementation of IFSPs for all children with identified special needs.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships
EHS: Early Head Start
IFSP: Individualized Family Service Plans

PROCEDURE

The program will establish a disabilities service plan, updated annually, to guide the program's efforts to meet the needs of children with disabilities and include them and their families in the full range of Early Head Start services. The program will participate in the implementation of an individual plan for all children with special needs.

1. EHS teachers along with participation from each child's family will complete The Ages & Stages Questionnaires®, Third Edition (**ASQ-3™**) and Ages & Stages Questionnaires®: Social-Emotional, Second Edition (**ASQ:SE-2™**) within 45 days of enrollment. Should concerns come up related to a child's development using these screening tools, teachers will discuss the developmental concerns with EHS staff (Education and/or Health Coordinator) and families. Teachers will obtain signed written consent from families to make appropriate referrals in the community for further evaluation.
2. **ASQ-3™** and **ASQ:SE-2™** may be administered at any time during a child's enrollment should the teacher, parent or any SCACAP EHS CCP staff have concerns about a child's development.
3. For children that are enrolled into the program with existing Individualized Family Service Plans (IFSP), teachers will establish professional working relationship with the child's IFSP team members to work towards common goals. Teachers will incorporate IFSP goals into the child's lesson plan. Teachers will actively participate in IFSP team meetings when invited by the family to discuss child's development and goals.
4. Teachers will include children with disabilities into all classroom activities and routines. Teachers will seek assistance from EHS staff (Education and/or Health Coordinator) to adapt the classroom environment and activities to meet the special needs of children with disabilities.
5. The Education Coordinator and Health Coordinator will establish the plan and disability budget and will ensure that

the plan includes all necessary components of the Head Start Performance Standards. All staff will be involved

in the integration of services to children with special needs and the children will have the same access to services, as their typically developing peers.

6. EHS staff member(s) will participate in IFSP meetings whenever possible. EHS staff will attend IFSP meetings, upon parent permission and with invitation from BabyNet.
7. The plan will be used as a working document, which guides all aspects of serving children with special needs, including small group activities, modifications of large group activities and any individual help. The IFSP and/or IEP will be used in developing the teacher's lesson plans. It will be the responsibility of the teacher with input from the Education Coordinator to develop strategies and make accommodations based on the goals of the IFSP/IEP.
8. The Ages and Stages (ASQ) and Ages and Stages-SE (ASQ-SE) will be utilized as developmental screeners and will be administered within 45 days of entry by the parent and/or teacher. Parent consent forms will be signed and dated prior to screenings. Screenings will be completed during home visits or in classroom settings with results recorded immediately. Interpreters will be available in the family's preferred language to assist in the screenings. The Education Coordinator and/or teachers will review completed screenings to determine potential referral and/or re-screens. Re-screens will be completed as directed by the Education Coordinator, no later than 30 days from prior screen.
9. As a result of ASQ and ASQ-SE scores, teacher input, parent input and doctor recommendation, in-house referral forms will be submitted to BabyNet upon parent permission. The parent permission will include a signed and dated consent/permission form for referral to and evaluation (when appropriate). An IFSP should be in place within 45 days of the referral to Baby Net. Measures will be taken to coordinate private therapy (OT, PT, ST) in the event that Baby Net services do not take place within expected timelines.

When determined, the following will be provided:

- a. Audiology services: The local health department, physician or Early Head Start staff will screen and identify hearing loss and referral for medical or other professional attention. The Education Coordinator/Health Coordinator will coordinate services.
 - b. Physical therapy: The Education Coordinator will coordinate physical therapy at the center or child's home. Communication will be maintained between teaching staff, parents, and Education Coordinator by phone, face-to-face, or correspondence.
 - c. Occupational therapy: The Early Interventionist will coordinate occupational therapy at the center or child's home. Communication will be maintained between teaching staff, parents, and Education Coordinator by phone, face-to-face, or correspondence.
 - d. Speech or language services: The Early Interventionist will coordinate speech therapy at the center or child's home. Communication will be maintained between teaching staff, parents, and Education Coordinator by phone, face-to-face, or correspondence.
 - e. Psychological services: See Disabilities 11.5.
10. As determined by goals of the IFSP, the program will comply with the Americans with Disabilities Act regulation and ensure facilities, materials, equipment, toys, and furniture meet requirements. The Education Coordinator will document all modifications and/or adaptations needed and completed for services. If a purchase is necessary, the Education Coordinator will follow the fiscal procedure for purchasing assistive technology services or devices to meet the objectives of the IFSP.

11. As a strength-based program, services will include options to meet the needs of each child based on the IFSP and availability of resources. The options include joint placement with other agencies, shared provisions of services, and shared personnel to supervise services, administrative accommodations, increased staff, and use of volunteers.

Procedure Title:	Recruitment, Selection and Enrollment of Children with Disabilities		
Procedure Number:	11.8	Effective Date;	October 1, 2018
Policy Title Reference:	Recruitment, Selection and Enrollment of Children with Disabilities		
Sub procedures			
Regulation References:			
Forms;	III		III
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP will actively recruit and enroll children with special needs and ensure that at least 10% of enrolled children are receiving BabyNet services under Part C of the Individuals with Disabilities Education Act.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

PROCEDURE

SCACAP EHS will actively recruit and enroll children with special needs to maintain the required percentage (10%) of enrolled children with special needs. The program will follow the same Policy and Procedure for Recruitment, Selection, and Enrollment for children without disabilities.

Procedure

1. The program will take the following factors into account when planning disabilities enrollment procedures:
 - Funded enrollment
 - Number of children with disabilities in EHS service area including types of disabilities and severity
 - Resources provided by other agencies and State laws.
2. The Education Coordinator and Center Directors will establish relationships with local early intervention providers for the purpose of recruitment and will collaborate with the state early intervention agency (**Baby Net**).
3. The program will provide EHS recruitment materials to the State early intervention agencies, hospitals, health centers, and school districts for potential enrollees throughout the year. Recruitment will be ongoing. In order to meet the 10 percent actual enrollment of children with disability requirements, the program will collaborate with various agencies within the local community that provide services to children with special needs. The Education Coordinator will be asked to provide professional resources and guidance to recruitment teams.
4. At least 10 percent of the total number of children actually enrolled during an enrollment year will be children with disabilities who are determined to be eligible for special services, or early intervention services by a state or local agency providing services under section 619 or Part C of the Individual with Disabilities Education Act [*IDEA*] (20 U.S.C. 1419, 1431et seq.). An exception to this requirement can be granted only if the responsible EHS Official determines, based on such supporting evidence as he or she may require and that SCACAP EARLY HEAD START has made reasonable effort to comply with the requirement, but was unable to do so because there was an insufficient number of children with disabilities in the recruitment area who wished to attend the program and for whom the program was an appropriate placement based on their IFSP, with services provided directly by Early Head Start or in conjunction with other providers. Children with disabilities in the Early Head Start Program shall receive services appropriate to their needs. SCACAP EARLY HEAD START will work with BabyNet in implementing the Individuals with Disabilities Education Act to assure provision of the coordinated delivery of services to infants and toddlers with special needs.

5. In compliance with the provisions of 45 CFR Part 84, "Nondiscrimination on the Basis of Disabilities in Programs and Activities Receiving or Benefiting from Federal Financial Assistance, and of the American with Disabilities Act of 1990," children who are enrolled are identified in one of these categories:
 - No Disability:** Child has no disabling conditions either diagnosed or suspected at time of registration/enrollment.
 - Suspected Disability:** Child has not been professionally diagnosed prior to enrollment and/or diagnosed; supporting documents are not given at the time of registration/enrollment. Disability will be noted as "suspected" until such time that the supporting documents are received. Criteria points revisited based on supporting documents. Parents report suspected disability during intake process.
 - Diagnosed Disability:** Child with one or more professionally diagnosed disabling condition(s) at the time of registration /enrollment; support documentation on file.
6. Staff will communicate with diagnosticians through telephone calls and/or personal contacts as needed, for recruitment.
7. Returning Intent Letters will be sent to parents of currently enrolled children with disabilities. Parents will be asked to acknowledge their intent to re-enroll their children for the upcoming year. Family Advocates will make contact with those parents who have not responded by designated time; either by phone or home visit to determine their intent.
8. Notices will be sent to parents of eligible children who were placed on the waiting list. Parents will be asked to acknowledge their intent in enrolling their children in Early Head Start for the upcoming year. Family Advocates will follow up.
9. The recruitment process will continue throughout the year to ensure that all families with eligible children in the targeted service area are aware and have access to Early Head Start services.
10. Child Protective Service agencies and foster homes will be contacted to recruit children in their care. In addition, agencies providing statewide supervision and assistance services, i.e., Department of Education, Department of Human Services, Health Clinics, and Department of Mental Health will be asked to share relevant data, which contributes to the successful recruitment of all eligible children.
11. The ERSEA Manager, with the FA, will have the delegated responsibility to assure compliance of all recruitment, selection, and enrollment of Early Head Start eligible children, disabilities regulations and procedures; for example, assurance that all funded slots are filled according to federal guidelines and this plan.
12. Recruitment documents (Application for Enrollment, Enrollment Intent Statements, etc.) are maintained at the Central Office level. Statistical data will be prepared at the Central Office level.
13. During the application process, questions will be asked and priority points will be assigned to the application. Selection will be based on the compilation of selection criteria ratings. A worksheet is completed for each application received. The data on the worksheet is entered into the child tracking system. Subsequently, a ranked listing of all applicants is produced from the child tracking system. This ranked listing is used to select children for enrollment in each Early Head Start Center. Waiting lists will be maintained throughout the program year at all centers and at the grantee level for EHS in order to promptly fill vacancies as they occur. The lists will be ranked by children with the highest points listed first.
14. Children with documented or suspected disabilities will be given extra priority points based on the priority grid used for enrollment.

Procedure Title:	Evacuation of Children with Disabilities		
Procedure Number:	11.9	Effective Date:	October 1, 2018
Policy Title Reference:	Evacuation of Children with Disabilities		
Sub procedures			
Regulation References:			
Forms,	III		
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates,			

POLICY

SCACAP will actively recruit and enroll children with special needs and ensure that at least 10% of enrolled children are receiving BabyNet services under Part C of the Individuals with Disabilities Education Act.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

PROCEDURE

SCACAP EHS will establish and implement a written emergency evacuation procedure for children with disabilities.

1. Each site will have a disaster preparedness plan, which will be recorded with DSS. The plan will include assignments, emergency locations and their telephone numbers, roster of children in the classroom and their home addresses and telephone numbers.
2. Each classroom will have an evacuation crib, which will be used during evacuation if needed. Teaching staff will be responsible for infants to be placed in the crib for evacuation.
3. Non-mobile infants will be carried by assigned staff or placed in the evacuation crib, while toddlers/mobile infants who walk well will be guided by teachers.
4. Infants and toddlers will be comforted as much as possible by the staff.
5. One staff person will be assigned to each child who needs assistance and will be responsible for the evacuation of that child during evacuation.
6. Once alerted, the teachers will follow the evacuation routes, which will be clearly marked and posted so that the path to safety outside is understood.
7. One teacher will check all available areas for children before leaving the building and a head count will be done to ensure all children present are with staff members and safe. The same assigned staff member will collect any necessary equipment needed, such as a respirator or other health related equipment for the children with special needs.
8. Teaching staff will carry the class roster and children's information to contact parents, if needed.
9. Upon returning to the classrooms, the Center Director will record the evacuation on an evacuation form.
10. The center will ensure that each site has a working smoke detector and exits are clearly marked and visible.

Procedure Title:	Staffing and Training		
Procedure Number:	11.10	Effective Date:	October 1, 2018
Policy Title Reference:	Staffing and Training		
Sub procedures			
Regulator; References			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP will provide the staffing and training necessary to meet the needs of the children with special needs. To increase the abilities of staff and parents to meet the needs of children with disabilities, training and technical assistance will be provided.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

PROCEDURE

SCACAP EHS will provide the staffing and training to meet the needs of the children with special needs. To increase the abilities of staff and parents to meet the needs of children with disabilities, training and technical assistance will be provided.

Procedure

1. The Health Coordinator will be responsible for managing, coordinating, and monitoring functions of disabilities services.
2. The Education Coordinators will be responsible for evaluating children, when necessary, that are referred with potential disabilities as outlined in the Collaborative Agreement and defined by South Carolina IDEA. If additional evaluations are needed, all local and state resources will be accessed to provide funding.
3. The program will provide opportunities for ongoing training and development for all staff that provides services to children with special needs. Training will include, but is not limited to: consultation with Education Coordinator, Health Coordinator, Mental Health Consultant, school district, and other appropriate agencies, adaptations to environment and special equipment, dual enrollment, and developing strategies based on IFSP goals. The training and technical assistance will allow staff to become knowledgeable about a variety of special needs and eliminate misconceptions and apprehensions. Staffing patterns will allow for continuation of classroom services while teaching staff attend training and technical assistance events.
4. Staff training regarding disabilities & mental health will be arranged or presented by the Education Coordinator and/or Health Coordinator.
5. The Education Coordinators and Teacher Mentors will provide consultation with the teachers to discuss IFSP goals, lesson plans, classroom environment, etc.

Procedure Title:	Monitoring (Disabilities Services)		
Procedure Number:	11.11	Effective Date:	October 1, 2018
Policy Title Reference:	Monitoring (Disabilities Services)		
Sub procedures			
Regulation References,			
Forms:			
SCACAP Executive Director Approval Date;	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP will establish and implement ongoing monitoring of disabilities services to ensure compliance with federal regulations.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

PROCEDURE

SCACAP EHS will establish and implement ongoing monitoring of disabilities services to ensure compliance with federal regulations.

1. The Health Coordinator will be responsible for monitoring of disabilities services through manual and electronic tracking, observation, and reports including the maintenance of 10% disabilities enrollment and reviewing the ERSEA Plan to ensure it includes children with disabilities in recruitment and selection.
2. Recruitment contacts will be documented by the ERSEA staff and monthly reports submitted to the SCACAP EHS-CCP Director.
3. The Education Coordinator will take the lead in ensuring the developmental screenings are completed. Completed developmental screenings will be tracked, indicating child's name, date of entry, date of screening. Monthly reports of the number of completed screens will be submitted to the SCACAP EHS-CCP Director. In addition, to ensure all screenings are completed within the required 45-day time period, the Education Coordinators will inform teachers of incomplete screenings and request that screenings be completed within the required time frame.
4. Through ongoing staff meetings, the Health Coordinator will discuss progress, strengths and needs of children & families, review program calendar, other relevant data and discuss financial designations for disabilities services, as needed.
5. The Health Coordinator will review the Disabilities Service Plan annually, update and submit for approval with the Policy Council.
6. The ERSEA Manager will track the number of children with disabilities and work closely with the Family Advocates to ensure compliance of obtaining 10 percent of disabilities enrollment. If this number cannot be obtained, recruitment efforts will be documented and a waiver request will be submitted to the Regional Office. All documentation will be maintained in the SCACAP EHS-CCP Office under lock and key.

Procedure Title,	Environment (Disabilities Services)		
Procedure Number	11.12	Effective Date:	October 1, 2018
Policy Title Reference:	Environment (Disabilities Services)		
Sub procedures			
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP will provide classroom and playground environments that are conducive to learning and appropriate for children with special needs.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

f> ROCEDURE

SCACAP EHS will provide classroom and playground environments that are conducive to learning and appropriate for children with special needs.

Procedure

1. The classroom and playground of sites with enrolled children with special needs will meet the ADA requirements for such disabilities.
2. The classroom will adequately reflect special needs awareness through posters, pictures, books, toys, etc.
3. The playground surfacing will support mobility and shock absorbance.
4. There will be adequate adaptive furniture and classroom materials when necessary.
5. There will be adequate adaptive outdoor equipment available when necessary.
6. Teachers will reasonably adapt their classroom arrangement to allow children with significant disabilities to participate in the full range of classroom activities.
7. The center will provide parent information on disability referrals.
8. The center will provide adequate adaptive equipment and utensils available for meal times when necessary.
9. The center will maintain a written emergency evacuation procedure for all children.

Procedure Title:	Personnel (Disabilities Services)		
Procedure Number	11.13	Effective Date:	October 1, 2018
Policy Title Reference:	Personnel (Disabilities Services)		
Sub procedures			
Regulation References:			
Forms:	III		
SCACAP Executive Director Approval Date!	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP will hire qualified staff and consultants and provide services to children with disabilities.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

PROCEDURE

SCACAP EARLY HEAD START CHILD CARE PARTNERSHIP will hire qualified staff and consultants and provide services to children with disabilities.

Procedure

1. The program will hire qualified Mental Health Consultants and Education Coordinators.
2. The Mental Health Consultant will be part of the disabilities budget planning process with the SCACAP EHS-CCP Director. The budget must include line items for salaries, evaluation of children, services, reasonable alterations, special equipment, materials (when all other means are exhausted.)
3. Duties of the Education Coordinator, Health Coordinator, Mental Health Consultant- will include: Developing, monitoring and coordinating the Disabilities Service Plan with appropriate involvement of the Health Services Advisory Committee and Policy Council; monitoring, facilitating and reporting on services for enrolled children with special needs; sharing disability information at monthly management team meetings; participating in the development of Individual Family Service Plans, if applicable; tracking referrals, assessment results and attending IFSP meetings to support parents; maintaining liaison relationships with other agencies, school districts, infant toddler programs, organizations and groups providing services to children with disabilities; corresponding with LEAs and maintaining current agreements; providing training for staff on inclusion, transition, referral procedures and forms; participating in annual self-assessment.

Procedure Title:	State and Federal Records Regulation (Disabilities Services)		
Procedure Number	11.14	Effective Date:	October 1, 2018
Policy Title Reference:	State and Federal Records Regulation (Disabilities Services)		
Sub procedures			
Regulation References:			
Forms:	III		
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates;			

POLICY

SCACAP will maintain confidentiality in accordance with state and federal requirements.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

PROCEDURE

SCACAP EHS will maintain confidentiality in accordance with grantee, state, and federal requirements.

Procedure

1. Children's disabilities records will be kept under lock and key at SCACAP Early Head Start Child Care Partnership Office and log in/out forms will be implemented for access.
2. Confidential information will be shared with other programs only with parent's written permission.
3. IFSP goals and modifications are the only part of the IFSP that is allowed in a child's classroom folder.

12.0 Due to renumbering of an early draft, this manual contains no Section 12.

13.0 Child Nutrition

13.1 Identification of Nutritional Needs

13.2 Meal Service

13.3 Child and Adult Care Food Program

13.4 Food Safety and Sanitation

Procedure Title::	Identification of Nutritional Needs		
Procedure Number:	13.1	Effective Date:	October 1, 2018
Policy Title Reference!	Identification of Nutritional Needs		
Sub procedures	A. Nutritional Screenings & Assessment B. Child Nutrition Assessment C. Food Allergy D. Special Dietary Needs E. Food/Nutrition Experiences F. Infant & Toddler Nutritional Needs G. Nutrition On-Going Monitoring H. Family Assistance with Nutrition		
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date;	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP will, in partnership with the Child Care Partner sites, assess the nutritional needs of children within the first 45 days of enrollment. Staff and families will work together to identify each child's nutritional needs including, but not limited to, eating patterns, cultural preferences, special dietary requirements, and/or any nutritional-related health problems. Children will be provided regular, nutritious, age-appropriate meals and snacks based on identified needs and serve meals in a "family style environment."

SCACAP will support the Child Care Partners in participating in the CACFP which includes the application, implementation, and reimbursement processes. SCACAP, in partnership with the CCPs, will support the provision of all nutrition and safety requirements in sites enrolling EHS children. SCACAP will maintain an efficient and effective record-keeping system to provide accurate and timely nutrition services and information.

DEFINITIONS

- SCACAP: South Carolina Association of Community Action Partnerships
- EHS: Early Head Start
- CCPs: Child Care Partner sites
- CACFP: Child and Adult Care Food Program

PROCEDURE

OVERVIEW: Nutrition Assessment will be completed in the first 45 days after enrollment into the SCACAP EHS-CCP Program and evaluated by a Registered Dietitian after collection of heights and weights and calculation of BMI (Body Mass Index.) by center staff and Family Advocates. SCACAP EHS-CCP staff and families shall work in partnership to assess and identify the nutritional needs of enrolled children in EHS.

DEFINITION OF TERMS:

EHS Registered Dietitian (RD)

PROCEDURE: Nutritional Assessments

1. At the initial meeting with the parent, teachers will ask the parent if their child is currently enrolled and receiving services from the WIC program.
 - a. If the answer is YES, have the parent immediately sign the *Release of Information* form.

- b. If the answer is NO, and the child is under 5 years of age, teachers will explain the benefits of the WIC program, provide information, and encourage the parent to apply for WIC assistance.
2. If the child does not qualify for WIC, or if the parent does not choose to apply for services, teachers will complete the *Child Nutrition Assessment* with the parent. Height and weight measurements will be taken by staff when the child is first enrolled, 6 months thereafter, and annually at enrollment anniversary.
3. Teachers will send completed *Child Nutrition Assessment* and WIC Participant Summaries to the Health Coordinator for evaluation. Teachers will retain copies of WIC releases, WIC Participant Summaries and *Child Nutrition Assessment* in the child's file.
4. After reviewing the assessments, the Center Staff or Family Advocate will gather the required information and discuss the assessment and accompanying information with the parent on the next home visit or parent-teacher conference.
5. The Health Coordinator, contracted Registered Dietician and/or WIC personnel will be available for assistance in the event of continuing nutritional concerns of the child or family.

A. SUB-PROCEDURE: Nutritional Screenings & Assessment:

1. The SCACAP EHS-CCP Health Services staff shall conduct a nutritional screening on each child upon enrollment in Head Start and EHS within 90 days of enrollment. Also the staff will conduct or partner with community organizations to provide a nutritional screening of expectant and postpartum women enrolled in EHS.
2. The following information as applicable in conducting the nutritional screening: a nutritional questionnaire, children's and women's health/medical records, the family's feeding patterns, cultural preferences, community nutritional data, participation/enrollment in WIC, etc.
 - a. For infants and toddlers, their unique nutritional needs shall be reviewed. Such issues include current feeding schedules and amounts and types of food provided, including whether breast milk, formula, and/or baby food is used, meal patterns, newly-introduced foods, food intolerances and preferences, voiding patterns, and observations related to developmental changes in feeding and nutrition.
3. Upon assessing each child's nutritional status, a nutritional assessment will be done as needed based on the results of the nutritional screening. The same process flow shall be utilized for expectant and postpartum women enrolled in EHS.
4. The EHS Registered Dietitian (RD) shall assess every enrolled child by reviewing their completed Nutrition Information Form to determine whether the assessment is "normal" or "referred."
 - a. If the assessment is "normal", a copy of the completed Nutritional Information Form is filed in the child file
 - b. If the assessment determines a "referral" is necessary, the following actions will occur:
 - i. The Nutritional Information is returned to the center with nutrition-related concerns noted by the EHSRD.
 - ii. The EHS RD will provide recommendations and resources for actions/interventions to help the family address the concerns noted.
 - iii. The **ERSEA**, Family & Community Partnership Coordinator, Teacher, and/or EHSRD will work with the family to establish goals to address the noted concerns. Progress shall be regularly noted in the child's file.
 - iv. The EHS RD may be called upon to assist in providing parental education to address the noted concerns.
5. Different nutritional questionnaires shall be utilized depending on age of child and/or expectant and postpartum women status.
6. Any identified nutritional related disabilities, food allergies, special diets as ordered by medical professionals, or any other suspected nutritional risk factors shall be immediately referred to the EHS RD for review.
7. If it is noted that the child is not enrolled in WIC the ERSEA, Family & Community Partnership Coordinator will work with the family to establish a goal of WIC enrollment if eligible. Progress will be noted in the child's file.

B. SUB-PROCEDURE: Child Nutrition & Assessment

1. ERSEA/FCP Coordinator or FA will discuss and complete a nutritional assessment using the ChildPlus database during the intake process. Parents will fill out the form completely and identify any special needs or accommodations needed, and indicate these needs on the form as well as in ChildPlus.
2. Health Services staff will review assessments to ensure the special needs or accommodations required are provided.
3. If the Health Services staff will track and monitor the services using ChildPlus and any other tracking system currently being used, and will communicate with the teaching team and food service staff of the status of the child.
4. If there are any menu accommodations needed, a note from the doctor or religious leader is required. The ERSEA/FCP Coordinator or FA must work with families to acquire this documentation and give it to the Health Services staff to file for review and application.
5. The Health Services Staff will measure the children for height/weight twice a year, once within 90 days and again in Spring (beginning March). He/she will record the measurements in ChildPlus for each child and provide assessment report to parents.
6. The Health Services staff will also review the growth charts. If a child is above the 95% or below the 5% for height, weight or height-to-weight ratio, the child's parents will be notified and it will be recommended to meet with the Nutrition Consultant.
7. If necessary, the Health Services staff will send a follow-up letter with suggestions for weight maintenance or weight gain to the parent.
8. The Health Services staff will review and apply any recommendations the doctor may suggest.

C. SUB-PROCEDURE: Food Allergy

1. Modification of meal menus for children with special medical or dietary needs must be performed by the program's Registered Dietitian in consultation with the child's primary health care provider.
2. A "Child Health Plan for Food Allergies/Intolerances" form must be completed by a child's parent to specify food allergy or intolerance, what to do if child ingests the food, the child reactions, and how to respond to the reactions. Primary health care provider in order for the Registered Dietitian (RD) to modify center menus. The parent/guardian will receive the form from SCACAP EHS-CCP staff to present to their medical provider. The form will prompt the medical provider to include specific food allergy, what to do/medication prescribed if the child ingests the food, and what food to substitute for the food the child is allergic to as well as the medical provider's name, signature, and phone number.
3. Upon return of the "Medical Condition Action" form to the EHS program from the child's parent/guardian or health care provider, staff shall place a copy in the child's file and forward the completed form to the EHS Registered Dietitian and the food service provider. The RD will consult with the food service provider immediately to restrict any potential harmful menu items on the immediate period between receiving the "Medical Condition Action Plan" and issuing a revised allergy-specific menu if needed.
4. The SCACAP EHS-CCP Registered Dietitian shall complete the "Registered Dietitian Consult Form". A copy will be given to the Center Director /and or child's teacher to place in the child's nutrition file.
5. The SCACAP EHS-CCP Registered Dietitian will revise center menus for the individual child, i.e., create a specific "allergy menu," as needed per the "Medical Condition Action Plan." The RD shall consult the child's medical provider and parent/guardian as needed when revising menu. The RD shall use professional judgment in taking into account parental input beyond what is stated in writing from the child's medical provider.
6. Food Service provider will follow procedures for consideration of EHS classroom(s) and/or centers being declared free of a specific food item due to allergy concerns. EHS is a peanut free zone.
7. In absence of a local policy, EHS must have orders/instructions from a medical professional in order to restrict particular food item(s) from a classroom or building due to allergy or other medically-related issues.

D. SUB-PROCEDURE: Special Dietary Needs

OVERVIEW: Special diets will be provided for all children that require any dietary restrictions or modifications. A special diet is defined as any diet prescribed by a physician or dietitian. A special diet requested for religious restrictions will also be considered but not necessarily approved. Staffs that require a special diet will be accommodated.

1. The Health Coordinator will review the health and nutrition history form of each student for special dietary needs or restrictions prior to enrollment. If a special diet is requested, the Health Coordinator should then notify the Family Advocate of the students' dietary needs.
2. The Health Coordinator will review the request and inform the Family Advocate Manager and Teaching Team that a statement signed by a physician, dietitian or religious leader, depending on the reason for the special diet request, must support the special diet request. The Health Coordinator will follow up with the parents to ensure the request is obtained.
3. A statement signed by a medical doctor or dietitian must support a diet requested due to medical conditions/disabilities. The statements must verify that special meals are needed due to a medical condition/disability, identify the medical condition/disability, the alternate food to provide, and the form of food needed to meet the child's special dietary needs.
 - a. A statement signed a by religious leader must support a diet requested due to religious reasons.
 - b. This information must be obtained within 2 weeks of ordering a special diet for any child or the accommodations will be discontinued.
 - c. If approved, the Health Coordinator will make the necessary changes to the menu.
4. The Health Coordinator will then notify the food services of the change and record the change in the students' health file.
5. Staff who require special diets will need to provide a physician's order and will be expected to provide their own food and eat with the children; and, will not participate in the planned EHS meal. This will provide consistency for children and for food service record keeping procedures.

E. SUB-PROCEDURE: Food/Nutrition Experiences

OVERVIEW: In order to broaden children's' food experiences and to enhance the curriculum, staff will provide food/nutrition experiences in all EHS classrooms.

1. Food/Nutrition Experiences and/or cooking activities will be offered in all classrooms weekly. Teachers will include food-related activities within the weekly lesson plan.
2. Food/Nutrition Experiences can be part of or the whole snack for the day, part of the breakfast meal, or part of the lunch meal. Children will participate in food preparations as appropriate.
3. Families will receive educational materials to continue the learning process at home.

F. SUB-PROCEDURE: Infant & Toddler Nutritional Needs

OVERVIEW: Staff and families will work together to identify each child's nutritional needs.

SCACAP EHS-CCP staff and families' discussions about nutrition needs will be taken into account concerning:

1. Any relevant nutrition-related assessment data (height, weight, hemoglobin/hematocrit) obtained under 45 CFR 1304.20(a).
2. Information about family eating patterns, including cultural preferences, special dietary requirements for each child with nutrition-related health problems, and the feeding requirements of infants and toddlers and each child with disabilities (see 45 CFR 1308.20).
3. For infants and toddlers, current feeding schedules and amounts and types of food provided, including whether breast milk or formula and baby food is used; meal patterns; new foods introduced; food intolerances and preference; voiding patterns; and observation related to developmental changes in feeding and nutrition.
4. Infants who are formula fed will remain on the same brand of formula that they are currently being served at home to provide continuity of care. This is to be provided by the EHS Center at no cost to the parents as the center will seek reimbursement through the CACFP for the formula.
 - a. If the child is on a specialized formula due to health issues or allergies, the parent will provide or sign a release of information for the center to seek a Doctor's prescription/note for the formula in order for the center to provide the formula and seek reimbursement through the CACFP. A few examples of these are low-iron formula, formula for premature infants, Alimentum, and Nutramigen. The entire list is of all of the exempt formulas are listed on the CACFP website.

5. EHS Registered Dietitian to be available for nutrition assessments and education as needed.

G. SUB PROCEDURE: Nutritional Events

1. Food and beverages for all EHS sponsored functions will demonstrate optimal nutrition practices and maintain the following general guidelines:
 - a. Be flexible in meeting the needs of the families served (take in to consideration special needs, cultural preferences and personal preferences);
 - b. Provide nutritionally balanced meals (Breakfast, Lunch, snack) when children are included.
 - c. When children are eating follow CACFP guidelines.
 - d. Serve a variety of foods.
 - e. Refer to meal count policy.
2. Healthy snacks/food for all EHS sponsored functions will be supplied by stores, local restaurants or other authorized food service kitchens. Foods prepared at individual's homes cannot be used for parent events that are sponsored by EHS.
3. Food handling and preparation policy must be followed when preparing food for family functions.
4. Staff must be present and supervising the preparation, storage and service of food at all EHS functions.

H. SUB-PROCEDURE: Nutritional On-Going Monitoring

OVERVIEW: SCACAP EHS CCP CACFP Administration and Health Services staff will maintain an efficient and effective record- keeping system to provide accurate and timely nutrition services and information.

1. Staff will use ongoing monitoring to assure the nutrition services and education is comprehensive and timely for required children and families.
2. Nutrition tracking form and ChildPlus reports pertinent to expectant mothers will be submitted monthly to Executive Director.
3. Tracking will be used to follow-up with families to make sure appointments are kept, services needed are provided, and problems/issues are addressed early as possible.
4. Monitoring of CACFP will take place at least three times per year with no more than 6 months between visits and new centers will be visited within 4 weeks of operation. Two of the three visits will be unannounced. The Five Day Reconciliation PROCEDURES and form will be used.
5. SCACAP EHS-CCP will use EHS attendance and ChildPlus attendance records for CACFP for household contact PROCEDURES.
6. Cycle menus approved by a Registered/Licensed Dietitian will be maintained on file in central office.

I. SUB-PROCEDURE: Family Assistance with Nutrition

OVERVIEW: SCACAP EHS-CCP Direct staff will identify, through a family assessment process, parents with nutritional needs or concerns.

1. FA will determine, through the family assessment, if there are unmet nutritional needs in the family. Direct staff will discuss possible food supplement agencies and encourage families to utilize them.
2. FA will receive annual training on how to refer parents to local food banks, WIC, commodity foods distribution, Salvation Army, and food stamps.
3. FA staff will also offer training opportunities for parents to assist individual families with food preparation and nutritional skills, selection and preparation of foods and menus, money management and smart consumer techniques. Monthly newsletters will contain pertinent, useful nutritional information, and information on local food banks.

Procedure Title:	Meal Service		
Procedure Number:	13.2	Effective Date:	October 1, 2018
Policy Title Reference	Meal Service		
Sub procedures	<ul style="list-style-type: none"> a. Meal Development b. Feeding Children c. Family Style Dining d. Milk and Water e. BreastFeeding 		
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

EHS CCPs will provide children with regular mealtimes and nutritious foods comprising 1/3 of a child's daily nutritional requirements at each meal. Children and adults will eat together "family style" in a pleasant conversational environment. Menus will be developed to meet specific cultural, ethnic and age-appropriate preferences while introducing new foods. Children will be allowed to serve themselves and determine which foods they will eat, and how much they will eat. Children will receive food appropriate to their nutritional needs, developmental readiness, and feeding skills, as recommended by the USDA/CACFP meal pattern or nutrient standard menu planning requirements. SCACAP will provide parents/guardians with information on the benefits of breast feeding.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships
EHS: Early Head Start
CCPs: Child Care Partners
USDA: United States Department of Agriculture
CACFP: Child and Adult Care Food Program

PROCEDURE

Meal Service Overview:

SCACAP will provide children with regular mealtimes, and nutritious foods that make up 1/3 of a child's daily nutritional requirements are offered to children at the table. Children and adults will eat together "family style" in a pleasant conversational environment.

Menus will be developed to meet specific cultural, ethnic and age-appropriate preferences while introducing new foods. Children will be allowed to serve themselves and determine which foods they will eat, and how much they will eat.

Procedure:

Children and adults will eat in small groups facilitate conversation and social interaction. Adults will encourage interesting and pleasant conversation around children's total experiences, not limiting discussion topics to food and nutrition. Policies cannot be put in place which forbid classroom staff or assigned volunteers from eating with the children or which charges for meal cost. Staff and children cannot bring in outside food. Teachers may have outside food in the break room.

Teachers and other adults will model good eating habits and table manners and will set a good example by their positive attitudes toward, and acceptance of food served. Talk about personal dislikes of food will be discouraged. Children will be served all components from the menu. Appropriate tableware will be provided at all meal and snack times.

As developmentally appropriate children will have a variety of opportunities to pour liquids and pass food at meal and/or snack times. When children and adults have finished their meal, they will be expected to clear their own place. Children will then brush their teeth and find a quiet activity to do until everyone has finished eating. (See Steps for Monitoring Tooth Brushing instructions.)

The adult's role is to make sure that adequate amounts of nutritious foods are available (according to USDA/CACFP regulations). The child's role is to serve him/herself and ALL food components must be served to the child, although the child may decide which of these components he/she actually eats. Experimentation with new foods is encouraged, but not forced. Food is not used as a reward or punishment.

A. Menu Development:

SCACAP EARLY HEAD START classroom menus will reflect low fat, low salt, low sugar foods using the ChooseMyPlate.gov guidelines for infants and toddler children. Sources of Vitamin A and Vitamin C will be clearly identified. Beverage choices will be 100% fruit juice, whole or low fat white milk and/or water.

Early Head Start children will receive food appropriate to his/her nutritional needs, developmental readiness, and feeding skills, as recommended by the USDNCACFP meal pattern or nutrient standard menu planning requirements

Procedure:

1. Menu will be created with the assistance of the Health Coordinator. Menu items will reflect seasonal fruits and vegetables and culturally diverse foods.
 - a. Every child in the center classroom shall receive at least 1/3 of the child's daily nutrition requirements; full-day attendees shall receive ½ to 2/3 of the child's daily nutritional requirements. Children shall receive a nourishing breakfast if they have not had one prior to arrival.
 - b. Group socialization activities for Early Head Start events shall have a snack/meal option as appropriate.
2. Menus will be posted with date, month and year. Menu change suggestions will be considered for the following month's menu.
3. Special diets for individual children will be written with the assistance of the ABC nutrition services.
4. Menu substitutions will be indicated on each monthly menu. Substitution will be crossed out and new items will be written in and posted.
5. Cow's milk will **not** be served in the first 12 months of life unless they have a doctor's statement allowing whole milk. Children 12-24 months of age shall be served whole milk. Children over 2 years old will be served 1% milk.
6. The introduction of solid foods will follow USDA/CACFP guidelines for child's nutritional and developmental needs. If child has special nutritional needs child must have written documentation from primary health care provider.
7. Toddlers will be served age appropriate types of foods. Early Head Start staff will cut toddlers foods into small pieces.
8. Early Head Start staff will share the CACFP infant and toddler meal patterns with parents as a guide for parents to serve appropriate quantities and varieties of food at home.
9. Early Head Start staff will help toddlers become independent at meal times by encouraging them to select from a variety of acceptable foods, including those that represent cultural preferences.

B. Feeding Children Overview:

Children enrolled in SCACAP EARLY HEAD START centers shall receive age- and nutritionally-appropriate food which meets the feeding requirements of each child.

Procedure:

1. Menus shall be available to be reviewed by the SCACAP EARLY HEAD START Registered Dietician (RD) to ensure that each infant and toddler with special dietary needs receives food appropriate to his/her nutritional needs, developmental readiness, and feeding skills as recommended in the USDNCACFP meal pattern or nutrient standard menu planning requirements.
2. In order to promote bonding, an adult shall hold infants while feeding. Infants are not to be laid down with a bottle.
3. Infant feeding schedules will be documented by staff and shared with parents using the "Daily Sharing Information Sheet. Infants and young toddlers shall be "fed on demand" to the extent possible.
4. Infant formula is to be provided by the program in accordance to parent instructions. Special formula is to be utilized under physician orders only.
 - a. Formula utilized will be in powder form.
 - b. Formula may be warmed using warm water, never via a microwave.
 - c. Bottles/nipples must be washed according to sanitary guidelines.
 - d. Staff must abide by sanitary guidelines in preparing the formula/bottles.
 - e. Prepared bottles must be stored on a daily basis in a refrigerator at proper temperature. Opened and unused formula shall be labeled as to date and time opened and is to be discarded within 48 hours.
5. Introduction of solid foods at EHS centers will be made in partnership with parental instructions/input.
6. Toddlers shall eat meals in family style dining (see Family Style Dining Policy).

C. Family Style Dining Overview:

Meal times will provide a range of opportunities that support meaningful conversations with adults and support the development of social relationships. Meals shall be served family style with developmentally appropriate children, classroom staff, and assigned volunteers eating together and sharing the same menu to the extent possible.

Procedure:

1. Meals will be served in a pleasant, well-lit, and ventilated area that encourages socialization.
2. Classroom staff and assigned volunteers shall eat with the children to the extent possible, recognizing that individual dietary concerns, allergies, and multiple meal times during different class sessions may prevent the adult(s) from eating. If for some reason the classroom staff and assigned volunteer(s) cannot eat the meal, the adults shall be seated with the children facilitating the meal and socialization activities.
3. Classroom staff and assigned volunteers will sit with the children during mealtime modeling appropriate table manners and social conversation.

D. Milk & Water:

A sufficient quantity of milk (as per USDA/CACFP requirements) will be served and kept readily available to children for each meal served at the time of meal.

Procedure:

If a child has a *Medical Statement for Food Substitutions* form in place, that child will be served a non-dairy beverage nutritionally equivalent to milk that meets the same nutritional standards.

Should the physician recommend serving other than the above, that child's meal will not meet USDNCACFP meal component requirements and therefore will not be eligible for reimbursement.

If a child, who does not have a medical exemption for milk, would prefer water instead, the teacher is encouraged to say something similar to: "We are having milk with lunch, but if you are thirsty for water, you may have some after lunch." If the child does not then serve themselves milk, the teacher will pour a small serving of milk into the child's glass.

Adults will model drinking milk at mealtime. Water may be served at other times during the day, such as after outside play, to encourage the habit of drinking water for re-hydration. Mealtime at SCACAP EARLY HEAD START is a modeling and educational opportunity.

E. Breast Feeding: Breast Milk Storage & Handling Overview:

SCACAP EARLY HEAD START staff will provide parents/guardians with information on the benefits of breast feeding. Parents and staff will be provided with the proper guidelines for safe breast milk handling and storage for infants. Proper care must be taken for all stages of collection, storage, and administration of breast milk.

Procedure:

1. Storage of fresh breast milk:
 - a. Check that milk is labeled with child's name, date and time pumped. If not, ask mother to label it.
 - b. Place bottles in refrigerator or freezer.
 - c. Discard any defrosted unused milk after 48 hours. Keep fresh, unrefrigerated milk at room temperature for up to 2 hours, or refrigerate. Whenever possible, use fresh, not frozen, breast milk to retain maximum nutritional and infection fighting properties.

2. Storage of frozen breast milk:
 - a. Store frozen breast milk at or below 32 degrees Fahrenheit until thawed for infant feeding.
 - b. Discard if not used in 6 months.
 - c. Store in refrigerator after thawing.
 - d. Discard any unused thawed milk after 24 hours
 - e. Rotate stock using oldest frozen milk first.

NOTE: Frozen breast milk retains many important antibodies, is nutritionally superior to commercial formula for feeding of premature infants, and should be used when fresh milk is not available.

3. Preparation for feeding:
 - a. Check label to verify baby's name and that milk has not been stored longer than the recommended time. Label bottle with time and date thawed.
 - b. Warm the milk to body temperature in warm water bath. Do not use microwave to warm milk.
 - c. Shake milk vigorously to redistribute the cream layer.
 - d. Discard any unused milk from a feeding. Do not refreeze milk once thawed.
 - e. When handling breast milk wear gloves.

Procedure Title:	Child and Adult Care Food Program		
Procedure Number	13.3	Effective Date:	October 1, 2018
Policy Title Reference,	Child and Adult Care Food Program		
Sub procedures	<ul style="list-style-type: none"> a. CACFP Application b. Enrollment Form & Application for Free & Reduced Meals c. Master Roster of Enrollees d. Submitting Claims e. USDNACFP Meal & Snack Funding/Reimbursement f. Meal Count g. Training Requirements 		
Regulation References			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP EHS centers will enroll in - and utilize - the United States Department of Agriculture's (USDA/CACFP) Child and Adult Care Food Program (CACFP) as their primary source of funding meals and snacks. SCACAP EHS will not reimburse individual centers for daily meals and snacks as the CACFP program will be utilized for this purpose. CACFP is a nutrition education and reimbursement program for licensed family child care homes and centers. CACFP materials will be used to teach and help establish healthy eating habits. Centers will abide by all the rules and regulations of the CACFP in providing quality meals to enrolled children. Programs participating in the Child and Adult Care Food Program will follow all application procedures, renewal processes, and paperwork requirements.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships
EHS: Early Head Start
CACFP: Child and Adult Care Food Program
USDA: United States Department of Agriculture

PROCEDURE

A. CACFP Application

SCACAP center programs will use United States Department of Agriculture (USDA/CACFP) Child and Adult Care Food Program (CACFP) for the main source of funding meals and snacks. SCACAP will not reimburse individual centers for daily meals and snacks as the CACFP program will be utilized for this purpose. CACFP is a nutrition education and reimbursement program for licensed family child care homes and centers. CACFP material will also be used to teach and help establish healthy eating habits early in life.

SCACAP will abide by all the rules and regulations of the USDA Child and Adult Care Food Program in providing quality meals to SCACAP enrolled children.

SCACAP programs participating in the Child and Adult Care Food Program will follow the application procedures, renewal process and adhere to paperwork requirements.

Procedure:

The grantee will compile and submit the CACFP initial application/renewal application to the Department of Social Services

by the date requested.

B. Enrollment Form & Application for Free & Reduced Meals:

Enrollment Forms will be obtained on every child that participates in the Child and Adult Care Food Program. The program will determine eligibility for free and reduced meals per Early Head Start's agreement with the Child and Adult Care Food Program.

Procedure:

A completed enrollment form must be obtained on every child that participates in CACFP. The enrollment form must be obtained the month the child enrolls. It also must be signed and dated by designated staff the month the child enrolls. If a child does not have an enrollment form, the child, as well as meals consumed, will not be claimed for reimbursement.

The child's parent completes an application for Free and Reduced Meals at the time of enrollment when family income exceeds Early Head Start income eligibility guidelines.

For Early Head Start income eligible children, the income verification completed by the program for enrollment purposes will be used in lieu of the Application free and Reduced Meals.

All non-Early Head Start enrolled children must have an Application for Free and Reduced Meals regardless of the family income on file.

The child's parent or guardian must complete applications. If the parent/guardian is unable to complete the application, staff will assist and note this on the application form.

All enrollment forms and applications for Free and Reduced Meals will be submitted to the CACFP Administrator for review and classification.

If the child's parent/guardian refuse to complete the application, staff will record the child's name, birthday, and parent refusal to complete the form, and classify the child as "paid".

Refer to the Application for Free and Reduced Meals form for corresponding numbers to complete the application as follows:

- Child Information - Parent prints name and birthday of child enrolled in Early Head Start/Children Garden.
- Program Benefits - If parent receives food stamps or Transitional Assistance Program (TANF) benefits on behalf of the child, list food stamp case number or TANF case number. -Complete Foster Child - Fill out a separate application for each foster child. Check appropriate application box. Enter the foster child's personal income (put "0" if child has no income). Complete the form by proceeding to Part 4 and Part 5.
- Household Members and Monthly Income - USDA defines a *household* as a group of related or unrelated individuals (not residents of an institution or boarding house) who are living as one economic unit (i.e. sharing living expenses).
 - o If a food stamp/TANF case number is given or if a food stamp or TANF case number is not reported, list names of all household members including children not listed under Child Information and the total current household income in the appropriate column.
 - o The income reported must be last month's total gross household income listed by source, and for each household member. If last month's income does not accurately reflect the family's circumstances, a projection of annual income may be provided. Last year's income may be used as a basis for making this projection if no significant changes have occurred.

- The signature, last 4 digits of the social security number of an adult household member and the date the form was completed must be included in this section. Telephone number and address should be listed.
- Race -The racial or ethnic identity of the participant should be included but is not mandatory.

C. Master Roster of Enrollees

The program will maintain an enrollment roster, which lists the names of each child who participates in meal service during the month. All Early Head Start children that participate in CACFP are automatically Free (USDA Policy 11-2013). All non-EHS children will fill out a CACFP application.

Procedure:

- For each month of operation, a Master Roster will be updated to accurately reflect the number of children enrolled in the classroom.
- The Master Roster is to be submitted to the grantee CACFP Administrator monthly.
- Master Rosters are to be kept up-to-date and filed in a locked cabinet.
- Master Rosters are a live document and must be on-going and up-to-date
- Names on Master Roster should always reflect names on attendance form.

D. Submitting Claims

This policy explains the 30/90-day claim for reimbursement procedure and limits the number of revised claims SCACAP EARLY HEAD START may submit to CACFP.

Procedure:

- CACFP requires institutions to submit an original claim within 30 calendar days, and allows no more than two revisions to be submitted within 90 calendar days following the end of the claiming month.
- Institutions must submit to CACFP complete and substantially accurate original and revised claims within the 30/90-day deadlines. If an institution submits a claim after the 30-day deadline, the institution's reimbursement for the claim will be delayed and the institution will be required to submit information in writing to CACFP. This information must state the reason the claim was not submitted within 30 days and a description of the process that the institution has implemented to ensure that claims will be submitted no later than 30 days following the last day of the full month covered by the claim in the future. CACFP may, at its discretion, take appropriate actions including, but not limited to declaring an institution seriously deficient for repeated non-compliance of the 30-day claim deadline. Federal regulations will continue to require a written one-time exception request for claims submitted past 60 calendars days from the end of the claiming month.
- In order to ensure accuracy and proper payment of claims, CACFP will also limit the number of revised claims institutions may submit for reimbursement. Institutions will be permitted to submit two (2) revised claims in addition to, but only after, submitting an original claim to CACFP.
- Downward adjustments (changes made to a claim that results in a lower reimbursement than the reimbursement of the original claim submitted) can be made, and will be allowed at any time during the 90-day period. Downward adjustments beyond the 90-day period must be requested via mail to CACFP's Finance Department.
- Once an original claim has been revised twice, no additional revisions will be allowed unless those revisions result in a downward adjustment or from a CACFP review, audit or independent audit. Revisions made following a CACFP review, audit or independent audit are not counted towards the two (2) opportunities institutions have to revise claims themselves.

E. USDA/CACFP Meal & Snack Funding/Reimbursement

SCACAP EHS Child Care Partnership centers will use United States Department of Agriculture (USDA/CACFP) Child and Adult Care Food Program (CACFP) for the main source of funding meals and snacks. CACFP is a nutrition education and reimbursement program for licensed family childcare homes and centers. CACFP material will also be used to teach and help establish healthy eating habits early in life.

Procedure:

Identification

All children must have a copy of their birth certificate, hospital certificate or Medicaid Card before they start attending classes.

Name Changes

If a child has a legal name change (through adoption, etc.) during the school year, a copy of the legal judgment issued by the court will be obtained. If a misspelling of the child's name is noticed on attendance sheets, it will be crossed out and the correct spelling will be legibly printed next to the error.

Eligibility

Children enrolled in Early Head Start/Head Start, **even those over the income guidelines**, are automatically eligible for free meals and snacks in the USDA/CACFP CACFP, NSLP, and SBP without further application or eligibility determination.

The document showing the child/children are currently enrolled as participants in Early Head Start is sufficient documentation of automatic eligibility. Documentation must be readily available to the official designated by the district to determine eligibility for free meals.

F. Meal Count

Each SCACAP center using USDA/CACFP meal and snack reimbursement will monitor daily meal attendance.

Procedure:

- o Meal counts are marked on the meal count record form by classroom staff at each meal and snack.
 - o Classroom staff will tally the number of meals for children, adults, and siblings at the bottom of each daily column, **AT THE TIME OF SERVICE**. Adults eat family style meals and mark on the meal count record form.
 - o Classroom staff will enter meal counts for both staff and children in ChildPlus at time of service.
 - o At the end of the week, classroom staff turns in their sign in/out sheets to the center director.
 - o The center director or supervisor signs and dates all of their sign in /out sheet. Director verify times and dates to see that they match data in ChildPlus.
 - o The center director submits the meal count record and sign in/out sheets to a designated staff member.
 - o The designated staff member collects all of the meal count record by the third (3rd) of each month, verify that all data is complete, use the data to complete claim reimbursement form, then submit to center CACFP administrator by the fifth (5th) of the month. Incomplete/inaccurate sheets will be given to the teachers for follow up, along with a disciplinary action.
 - o Center directors computes the average daily attendance for every center, food costs, verifies all figures for accuracy. Center directors submit CACFP claim by the 15th of the month.
- **Special Circumstances - Meal Attendance Sheets**
 - If you have a child come in late, offer that child the meal or snack most recently served. If you have a child that does not like the meal and won't eat it, do not force the child to eat but encourage the child to try one (1) bite and

keep everyone company at the table. As long as the child sits down at the table and the food is offered we can count the child for the meal.

- If class is cancelled due to problems with heat, weather, etc., across the day affected write, "No Class Today - Reason."

G. Training requirements

The purpose of this policy is to clarify training requirements for Child and Adult Care Food Program (CACFP). The policy applies to all centers participating in the Child and Adult Care Food Program (CACFP). SCACAP is participating in the CACFP. SCACAP requires all teachers to attend CACFP training. Staff attending training receives vital information about the CACFP, operating the CACFP, CACFP regulations, SCACAP policy, and additional pertinent CACFP information. SCACAP requires participants to attend annual training. Attendance at the additional training session(s) may be mandatory or optional.

The person that attends Program training on behalf of SCACAP as the Program Contact must be a legal employee of that entity. The Program Contact is responsible for training all staff within the institution that have CACFP duties and tasks. The Program Contact must train any administrative or operating staff with CACFP duties to the extent necessary to ensure that staff person can successfully complete their assigned CACFP duty (ies). Failure of the Program Contact to train other staff with CACFP responsibilities will result in the institution being declared seriously deficient.

Federal regulations require sponsoring organizations to provide training to "key staff" for all new sponsored facilities on Program duties and responsibilities prior to the beginning of Program operations. "Key Staff" includes the facility employee(s) who is responsible for the overall management and administration of the CACFP for the facility. This would include employees responsible for completion of daily paperwork, recordkeeping, monitoring, and application and/or claim submission.

Procedure: Attendance by "key staff" at these training sessions is mandatory.

- At a minimum, such training must include instruction, appropriate to the level of staff experience and duties, on the Program's meal patterns, meal counts, claims submission and review procedures, recordkeeping requirements, and the reimbursement system.
- The "key staff" within each facility are responsible for providing training to other facility staff that have responsibilities related to the CACFP such as taking point of service meal counts, menu planning, and cooking. Failure of a sponsoring organization to provide this mandatory training to "key staff" and ensure that all "key staff" of new sponsored facilities attend the training will result in the sponsoring organization being declared seriously deficient. Failure of "key staff" to attend mandatory training must result in the sponsored facility being declared seriously deficient.
- The agency must maintain records of training received/attended. Sponsoring organizations, in maintaining training records, must ensure that the records indicate the location of the training, the topics presented (its subject matter), the date the training was offered, and the name(s) of the attendees, and verification of their attendance (i.e. sign-in-sheet). SCACAP will maintain all materials that were used or given out at the training. Documentation of attendance at mandatory trainings **will be** verified during CACFP reviews.

Procedure Title:	Food Safety and Sanitation		
Procedure Number:	13.4	Effective Date:	October 1, 2018
Policy Title Reference:	Food Safety and Sanitation		
Sub Procedures			
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

The food preparation process will include strict observation of personal hygiene, continuous application of sanitary food-handling techniques, destroying harmful bacteria, thorough washing, and minimal handling of food throughout the process.

Only employees and regular volunteers trained in food handling procedures will prepare food for breakfast, lunch, snacks, or cooking projects. Additional parents and volunteers may help with cooking and food-related classroom projects under the supervision of a trained employee or volunteer.

DEFINITIONS

N/A

PROCEDURE

The food preparation process will include strict observation of personal hygiene, continuous application of sanitary food-handling techniques, destroying harmful bacteria, thorough washing, and minimal handling of food throughout the process.

SCACAP EARLY SCACAP EARLY HEAD START requires that evidence of compliance with Federal, State, and local food safety and sanitation laws related to the storage, preparation, and service of food and health of the food handlers will be followed.

1. The food service departments that provide the food for Early Head Start will have their food service inspection form posted in the kitchen.
2. Health Services staff will conduct sanitation internal monitoring at the center-based programs at least annually.
3. Early Head Start centers will have proper storage areas for breast milk, formula, other liquids and foods served to children.
4. In the center-based programs, Early Head Start staff will take the temperatures of foods and fluids at the point of service daily and record as directed on the food temperature logs.
5. Early Head Start staff will follow the proper handling of breast milk and formula which includes the following:
 - a. Bottles will never be warmed in a microwave due to uneven heating and the possibility of causing burns.
 - b. Containers of breast milk or formula will be marked clearly with the child's name and the date.
 - c. Breast milk and formula will be discarded if not used within 48 hours, if refrigerated or, 6 months if frozen.

d. To avoid spoilage, bottles of breast milk for formula will not be warmed at room temperature or in warm water for extended periods of time.

6. Early Head Start staff members at centers serving infants and toddlers will have proper instruction on the handling of commercially prepared baby food which includes the following:
 - a. When opening a new jar, check the expiration date or "throw away" date.
 - b. Throw away baby food jars if the date has passed.
 - c. Check to see that the safety button in the lid is down. The jar should "pop" when opened. If it does not, don't use.
 - d. Write the child's name, date opened and date to be thrown away on the label.
 - e. Spoon a serving from the jar into a dish before feeding.
 - f. Do not feed directly from the jar.
 - g. Do not put uneaten food from the dish back into the Jar.
 - h. Do not heat baby food Jars in the microwave.

7. Early Head Start staff or food service staff members at centers serving children will follow proper cleaning and sanitation procedures of bottles, nipples, dishes and utensils used during meals and snacks.
 - Potentially hazardous foods requiring cooking must be cooked to heat all parts of the food to a temperature of at least 140° Fahrenheit, except:
 - Poultry and dressing must be cooked to heat all parts of the food to at least 165° Fahrenheit with no interruption of the cooking process.
 - Pork and pork products must be cooked to heat all parts of the food to at least 155° Fahrenheit.
 - Ground beef must be cooked to at least 155° Fahrenheit.
 - Other beef, eggs, fish to at least 145° Fahrenheit.
 - Microwaveable foods must be heated to 165° Fahrenheit and allowed to stand for two minutes before serving.
 - Potentially hazardous foods that have been cooked and then refrigerated must be reheated rapidly and thoroughly to 165° Fahrenheit or more before being.
 - Potentially hazardous foods must be thawed:
 - Under refrigeration at a temperature below 40 degrees Fahrenheit;
 - Under cold running water, no longer than 2 hours;
 - In a microwave oven only when the food is being cooked immediately afterwards;
 - As part of the conventional cooking, i.e.: hamburger patties or shrimp.
 - Potentially hazardous food must be kept at an internal temperature of 40 degrees Fahrenheit or below, or at an internal temperature of 140 degrees Fahrenheit or above during the holding period.
 - Each serving bowl on the table has a separate spoon or other utensil for serving food. Cover food in bowls to set on table before serving. Use plastic wrap for cold, aluminum foil for hot.

- Place minimum quantities of every meal component (see USDA requirements for infants and toddlers) on the table and add as amounts become depleted. This way less food will be wasted and food will be available in the case of an accident.
- No leftovers from the table will be sent home with children, staff, or adults due to the hazards of bacterial growth. No leftovers from the table can be reused in the kitchen.
- Pour milk into clean pitchers for each meal.

14.0 Child Mental Health

14.1 Classroom Observation by a Mental Health Professional

14.2 Referral for Mental Health Services

- 15.0 Family and Community Partnerships
- 15.1 Family Assessment and Goal Setting
- 15.2 Parent Orientation
- 15.3 Addressing Diversity in Early Head Start
- 15.4 Accessing Community Services and Resources
- 15.5 Emergency and Crisis Assistance
- 15.6 Family Contact and Case Notes
- 15.7 Counseling Programs and Information
- 15.8 Community Advocacy
- 15.9 Home Visits
- 15.10 Information-Change of Status
- 15.11 Community Services
- 15.12 Parent Committees
- 15.13 Parent Feedback
- 15.14 Parent Education and Employment
- 15.15 Parent Handbook
- 15.16 Parent Education and Involvement
- 15.17 Parent Activity Funds
- 15.18 Parent-Community Representative Reimbursement
- 15.19 Transitions into Head Start or Preschool

Procedure Title:	Family Assessment and Goal Setting		
Procedure Number	15.1	Effective Date;	October 1, 2018
Policy Title Reference:	Family Assessment and Goal Setting		
Sub procedures			
Regulation References			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP will engage in a collaborative partnership building with families to establish mutual trust and to identify family goals, strengths, and necessary services and other supports.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

REFERENCED PROCEDURES

Parent Involvement

Research indicates that to sustain the gains made by the child in Early Head Start, they must be understood and built upon by the family and the community. To achieve this goal, Early Head Start will provide for the involvement of the child's parents and family members in the child's Early Head Start experience. Parents of enrolled children will be encouraged to participate in the full range of program and decision-making activities.

Parents will be encouraged to serve in the Early Head Start classroom as volunteers, taking an active part in the daily schedule of activities with children, helping with facilities or taking part in other projects. When appropriate, parents will be used as volunteer or paid substitutes in the classroom, or in the kitchen.

All parents of currently enrolled children will be considered members of the Parent Committees. As a member of one of these groups, parents will participate in making decisions about the program's curriculum and will provide staff and Policy Council with input for developing local program policies, activities and services. Parent Committees may organize social events, community projects, classes, workshops, guest speakers, support groups or fund-raising activities.

Two representatives from each Early Head Start center will be elected by the Parent Committees each year to serve on Policy Council. Parents elected to Policy Council will participate in the process of making decisions about the nature and operation of the Early Head Start program, will participate in the annual program self-assessment, and will serve as a link between the Policy Council and the Parent Committee.

As the primary educators of their children, and in cooperation with the teaching staff, parents will be encouraged to reinforce skills their children have learned at school, and encourage the development of new skills in the home environment.

Family Partnerships

Early Head Start staff will engage in a process of collaborative partnership building with parents to establish mutual trust and to identify family goals, strengths and supports. Staff will be sensitive to individual family strengths and abilities as

well as family needs. Contact will be ongoing throughout the year with teachers providing regular support and reinforcement of goals and strategies.

The partnership process will involve family goal setting, coordination with pre-existing plans, and support and encouragement for parental involvement and participation in program activities. Linkage to appropriate resources as well as crisis intervention services will be offered relevant to expressed needs. Parents will have ongoing opportunities to be involved in a wide range of activities designed to support families through provision of health, nutrition, child development, and mental health educational services.

Procedure for Family Goal Setting and Family Partnership Agreement:

The overall goal of the Family Partnership Agreement process is to teach parents about problem solving, planning and goal setting. An outline of the Family Goal Setting Process is included in the Home Visit. Teachers will use the *Family Partnership Agreement* to guide this work.

1. The process begins with the relationship established with the family from initial contact. During the application and enrollment process, staff and parents will begin to know each other and information will be collected about the family. The staff member should review this information immediately prior to meeting with the family to complete the *Family Partnership Agreement*.
2. Staff member will discuss the planning process with the family. Staff member will help the family identify their strengths as individuals and as a family, and may note resources currently being used. Future goal-setting will be based on the family strengths and existing family supports that are identified early in this process.
3. The next step is to assist the family in determining what they want to work on at this time. This can be done through a discussion of family needs, desires or dreams. Families may wish to work with existing family plans, with Early Head Start providing additional support and resources to achieve desired goals or outcomes.
4. Develop reasonable and practical goals and objectives with the family. Identify resources that can be used to accomplish goals and objectives using the *Community Resource Directory* and family or staff member knowledge of the community. Discuss possible barriers or anticipated problems in accomplishing the desired outcome, assign responsibility for accomplishing each step (parent, teacher, etc.), and determine an estimated date or timeframe for completing each step.
5. Document plans and progress. Staff will check back regularly by phone or in person to check on progress, provide additional assistance, or make adjustments to the overall plan. Make sure that celebration of success is built into the plan and acknowledged by staff and parents.

Role of the Early Head Start Staff:

- Help the family assess their own strengths and needs;
- Work with the family to develop family goals and objectives using the Family Partnership Agreement form;
- Provide information about available family resources and link the child, parent and family to services appropriate to meet expressed needs;
- Monitor and evaluate the delivery of support and services to the family or individual family members to ensure that services are received and appropriate;
- Advocate on behalf of the child and family; and
- Teach the parents how to advocate for themselves and their family members and effectively communicate their needs, ideas and concerns to service providers.

Procedure:

1. After families have been identified as eligible for program participation, registration will take place. The initial application process or submittal of re-enrollment form letter, the Health and Nutrition phase, and the Family Service phase of the registration process will be completed.

2. Each phase will involve a personal face-to-face with the family enrolling in the program with an ongoing relationship being developed through each registration interview process.
3. The Family Partnership building process begins within 45-90 days calendar days after a child's enrollment and is ongoing throughout the family's participation in the program.
4. The family face-to-face meeting interview and Parent Interest Survey and Family Assessment Form will be used to assist Family Advocates in helping families establishing realistic goals according to family's current well-being. Each family will have an ongoing relationship throughout the year working with the staff and Family Services team to develop a partnership that allows for the development of goals and meeting the challenges faced to overcome obstacles for the continued success of new goal setting.
5. Family Advocates should use the following forms in this process that will eventually lead to goal setting: ChildPlus Application, IEP or IFSP (if applicable), Health History, Family Assessment Form and others as needed. Each Family Partnership goal will be documented in the appropriate section of the Child Plus report to generate a list of needs and needs met services provided by the Early Head Start program, so that an accurate reflection of the annual PIR will show the program goals and outcomes for each family on an individual and group level.
6. After information is collected from the family on meeting the challenges that prevent goals from being achieved, the Family Advocate (FA) will fill out a referral form to the appropriate agency with documented follow-up being done to see that each family had needs met in a timely and appropriate manner.
7. Each FA will have the necessary community resource tools to accurately pinpoint where services may be accommodated and how to better assist families in accessing these services.
8. The Family Partnership Agreement (FPA) is an ongoing process that involves the parents and families and focuses on the strengths, needs and Interests of the family. Development of goals, activities, providers, target dates, completion dates, follow-up, and evaluation are all involved in the process that assists parents and families in gaining access to the community services that can meet their needs or strengthens their ability to care and advocate for their children.
9. Family Partnership Agreement (FPA) must be initiated as early after enrollment as possible, but taking into consideration each family's readiness and willingness to participate in the process.
10. Family Partnership Agreement (FPA) should be reviewed with families throughout the program year in accordance with the target dates set for the activities noted on the FPA. The date of a review will be noted on the agreement, and in the database. FPAs can be completed throughout the program year. Obtaining written FPAs can be a tool that greatly increases the participation and likelihood of follow-through for families.

Procedure Title:	Parent Orientation		
Procedure Number	15.2	Effective Date:	October 1, 2018
Policy Title Reference:	Parent Orientation		
Sub procedures			
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates;			

POLICY

To ensure that parents are informed of the day-to-day activities of the EHS program, parents shall receive an orientation at the time of enrollment, to include their rights and responsibilities within the program.

DEFINITIONS

EHS: Early Head Start

REFERENCED PROCEDURES

Before their enrolled child starts attending class, parents must participate in orientation at the beginning of the new school year. More than one session may be offered to accommodate parent's varying schedules. Parents of children enrolled after the new school year begins, must also attend parent orientation prior to the child beginning class. This orientation may be completed with the Family Advocates. The following information is given to parents in orientation:

Introduction to Early Head Start and Child Care Center

- Welcome and Staff Introductions
- Overview of Early Head Start
- Calendar and Upcoming Events

Review of Parental Rights and Responsibilities

- Highlights from the Parent Handbook
- Parent Involvement
- Conferences and Home Visits
- Family Partnership Agreements and Goal Setting
- Volunteer Activities
- Shared Governance: Parent Committees and Policy Council
- Policy Council Officers (Job Responsibilities)
- Parent's Code of Conduct
- Physical and Dental Requirements

Daily Activities in the EHS Classroom

- Center Information
 - Expectations of Child Activities and Curriculum
 - Meals and Tooth-brushing
- Center Daily Schedule
 - Medical Services and Dental Services
 - Mental Health Services
- Children with Special Needs

Rules and Regulations

- What to Do in Case Your Child is Sick/Emergency
- Child Release Procedures
- Confidentiality
- Child Abuse and Mandatory Reporting

Procedure Title:	Addressing Diversity in Early Head Start		
Procedure Number	15.3	Effective Date:	October 1, 2018
Policy Title Reference:	Addressing Diversity in Early Head Start		
Sub procedures			
Regulation References:			
Forms:	III		III
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revision, Dates:			

POLICY

SCACAP will ensure that interactions with families are respectful of the diversity, culture, and ethnic backgrounds of participating families.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

REFERENCED PROCEDURES

1. Staff will enlist the aid of bilingual and bi-cultural individuals to provide assistance with paperwork, communication, and expressing cultural differences.
2. Staff will be respectful of each family's culture.
3. Train staff and volunteers to recognize that families differ across many dimensions, including language, family structure, religion, and educational and socio/economic backgrounds.
4. Provide cultural activities that interest both males and females.
5. Hire bilingual staff and place them in areas with the greatest need.
6. Providing program materials and information in multiple languages when and where possible.
7. Recognize and respect special needs and/or diets.

Procedure Title:	Accessing Community Services and Resources		
Procedure Number	15.4	Effective Date:	October 1, 2018
Policy Title Reference:	Accessing Community Services and Resources		
Sub procedures			
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP will provide families with comprehensive information about community resources, establish collaborative relationships with community organizations and support families in accessing needed services.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

REFERENCED PROCEDURES

1. A community services list will be developed and will be available to parents.
2. A community resource binder will be maintained in the EHS center. It allows easy access and is user friendly for parents and staff.
3. FA's are trained on new available community resources.
4. Should any parent contact result in a problem or the need of services, the Family Advocate will document the problem or need using Child Plus. On-going follow-up will be provided to monitor resolution of the problem or service need. If a referral is made over the phone, this event will also be documented in Child Plus.
5. Some of the methods the Family Advocates can use are:
 - Become thoroughly familiar with available community resources, both within the area served by the EHS center and the larger community.
 - Hold parent and family group meetings and invite presenters from local community agencies and/ or organizations to discuss their operations. Include a question and answer period for participants.
 - Help parents identify specific problems and associate them with the most logical agency to provide the service.
 - FAs can be helpful to families as they assist them in developing self-confidence and independence in dealing with community service providers.
6. Once contacts have been made with the service providers in the community, and communication has been initiated, it is important to keep the lines of communication open. Periodic contacts in person or over the telephone will help to maintain coordination efforts and stimulate cooperative activities. Information sharing keeps everyone involved in the process aware of:
 - a. What the others are doing;
 - b. What progress is being made by each member toward the common objective;
 - c. New directions that are being considered to accomplish goals.
7. The FAs are the primary link between the EHS center and families.

Procedure Title:	Emergency and Crisis Assistance		
Procedure Number:	15.5	Effective Date:	October 1, 2018
Policy Title Reference:	Emergency and Crisis Assistance		
Sub procedures			
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP will work collaboratively with participating families to identify and access (either directly or through referral), resources that are responsive to the emergency and family crisis needs of enrolled families.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

REFERENCED PROCEDURES

1. Family Advocate will take the lead in assisting families that might experience a crisis or emergency situation, directly or through referral to a community resource agency. The FA intervenes in emergency/crisis situations in order to assess the nature, severity, and impact of the crisis upon the family, to assist the family in identifying their own available resources or other agencies that can possibly meet the immediate need.
2. FA, when informed, will assist families in a crisis by identifying and contacting resources for long-term crisis intervention plan and services.
3. The Family Advocate will maintain contact with the family determining stability, and that the crisis has been resolved.
4. Staff interaction with the family will be documented in Child Plus by the Family Advocate and should be captured in the PIR section in the system.
5. Family Service case notes are to be captured under Family Partnerships in Child Plus, and in hard copy in the child's FS file.

Procedure Title :	Family Contact Case Notes		
Procedure Number,	15.6	Effective Date:	October 1, 2018
Policy Title Reference:	Family Contact Case Notes		
Sub procedures			
Regulation References:			
Forms:	III		
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

Family Contact Case notes will be used to document contacts made to families. Maintenance of these notes shall be the responsibility of the FA assigned to each family.

DEFINITIONS

FA: Family Advocate

REFERENCED PROCEDURES

1. Family case notes should be used to document specific contact made with enrolled families.
2. The family case notes should not be used in duplication to another form for example, an Education Home Visit must be documented on an Education Home Visit Form. Family phone number change should be completed on a Child Information Form. A person volunteering in the classroom should be documented on the In-Kind Form. An identified need of a family should be documented on a Family Service Referral Form. Parent Committee participation will not require a family case note.
3. If a child will be absent for an extended period of time (per parent/guardian), for instance with chicken pox, staff should get a return date. If the child does not return on the specified date, given by parent/guardian, the staff should follow-up according to attendance policies and procedures. The follow-up should be documented in case notes.
4. Family case notes are to be kept in each individual child's file housed in the SCACAP Office.

Procedure Title;	Counseling Programs and Information on Mental Health		
Procedure Number	15.7	Effective Date:	October 1, 2018
Policy Title Reference:	Counseling Programs and Information on Mental Health		
Sub procedures			
Regulation References:			
Forms:	III		
SCACAP Executive Director Approval Date,	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP will make available a list of counseling programs/mental health resources and information on mental health issues that place families at-risk including substance abuse, child abuse and neglect, and domestic violence.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

REFERENCED PROCEDURES

1. Assist parents to form linkages with counseling programs that target specific mental health issues.
2. **Make** available educational materials and opportunities to learn about mental health through:
 - Brochures
 - Bulletin boards
 - Community resource and referral information
 - Support groups
3. Staff is available to informally and confidentially discuss issues with children and families and to make appropriate referrals.

Procedure Title:	Community Advocacy		
Procedure Number	15.8	Effective Date:	October 1, 2018
Policy Title Reference,	Community Advocacy		
Sub procedures			
Regulation References:			
Forms,			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

EHS staff will serve as advocates for EHS families.

DEFINITIONS

EHS: Early Head Start

REFERENCED PROCEDURES

Early Head Start staff should represent the best interests of Early Head Start families to the community in the following manner:

- a. Visit social service providers and community groups.
- b. Serve as liaison for Early Head Start families.
- c. Establish good public relations with resources in the community.
- d. Represent the best interest of Early Head Start families to the community and other community agencies at all times.
- e. Inform social service providers and community groups of the purpose, nature, and operation of the Early Head Start Program.
- f. Obtain a Community Services Information Resource guide to distribute to parents.
- g. Make internal service requests to other Early Head Start staff and follow-up.
- h. Make the community aware of the need for additional resources, when and if needed.
- i. Assist in bringing new services into the community; serve on planning committees, etc.
- j. Place Early Head Start on providers' mailing lists to keep abreast of provider's activities.
- k. After identifying resources available for Early Head Start families, Partnership Agreements are developed to establish ongoing working relationship between Early Head Start and service providers.
- l. Accompany the parent to service providers, if needed.
- m. Following up with parent and **agency** regarding external referrals.

Procedure Title:	Home Visits		
Procedure Number :	15.9	Effective Date:	October 1, 2018
Policy Title Reference:	Home Visits		
Sub procedures			
Regulation References,			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP will make home visits a valuable tool in building respectful relationships with parents and assist program staff in developing a broad understanding of every child in the program.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

REFERENCED PROCEDURES

The Family Advocate will complete home visits as follows:

- Identify family needs for establishing a Family Partnership Agreement.
- After an emergency or crisis.
- If a child has irregular attendance.
- At the request of the family.
As needed basis.

Procedure Title :	Information - Change of Status		
Procedure Number	15.10	Effective Date:	October 1, 2018
Policy Title Reference:	Information -Change of Status		
Sub Procedures			
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP will ensure that child and family information changes are documented in a timely manner.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

REFERENCED PROCEDURES

- Parents are expected to report to their child/children's teacher or FA any demographic/ enrollment information changes in their family immediately, or within three (3) days of change.
- If teachers receive the change information, they will submit the information in writing to the child's Family Advocate. If the FA receives the change information, they must notify the child's teacher in writing.
- The child's FA will document the change in Child Plus and on the Child Information Form. An updated Child Information Form will be forwarded to the classroom teacher.

Procedure Title:	Community Partnerships		
Procedure Number:	15.11	Effective Date:	October 1, 2018
Policy Title Reference:	Community Partnerships		
Sub procedures			
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP will collaborate with community partners to provide optimal services to EHS children and families will foster the development of a continuum of family services, and advocate for a community that share responsibility for the healthy development of children and families of all cultures.

DEFINITIONS

SCACAP: South Carolina
Association of Community Action
Partnerships EHS: Early Head
Start

REFERENCED PROCEDURES

1. Develop formal and informal networks of contacts with representatives of community organizations. Each service area will be responsible for obtaining partner's agreements.
2. Join in community-wide interagency councils, and other planning initiatives to ensure that Early Head Start principles and programs are well represented in planning activities.
3. Consult with Head Start state collaborative offices and build on existing national and state agreements when pursuing local partnerships.
4. Collaborative relationships are strengthened through formal, written agreements, which help to ensure that relationships among agencies are maintained after the initiators of the agreements are no longer involved.

Procedure Title:	Parent Committees		
Procedure Number	15.12	Effective Date:	October 1, 2018
Policy Title Reference:	Parent Committees		
Sub procedures			
Regulation Reference, s			
Forms,	III III		
SCACAP Executive Director Approval Date;	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates			

POLICY

Each CCP participating in the SCACAP EHS program will establish a Parent Committee designed to involve parents in collaborative decision-making and joint governance. Each Parent Committee will elect a representative to serve on the Policy Council.

DEFINITIONS

CCP: Child Care Partner site
 SCACAP: South Carolina
 Association of Community Action
 Partnerships EHS: Early Head
 Start

REFERENCED PROCEDURES

1. The FA and center staff are responsible for coordinating and conducting a Parent Committee meeting within the first thirty days of center opening and/or in conjunction with parent orientation.
2. The Parent Committees will carry out at least the following minimum responsibilities:
 - a. Elect officers among eligible parents to represent the center and possibly the Policy Council.
 - b. Advise staff in developing and implementing local program policies, activities, and service within the guidelines.
 - c. Be active in planning, conducting, and participation in parent activities and meetings.
 - d. Assist staff in recruiting families for the program.
3. The Family Advocates and ERSEA Manager will assist Parent Committee officers in coordinating meetings and activities.
4. The Parent Committee minutes and supporting documentation must be filed in a binder or expanding file in the SCACAP Office. The binder should be accessible if parents request to review the documentation in the binder.

Procedure Title:	Parent Interest Survey		
Procedure Number:	15.13	EffectiveDate,	October 1, 2018
Policy Title Reference,	Parent Interest Survey		
Sub procedures			
Regulation References:			
Forms:	III		
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP will ensure that parents are provided opportunities to share feedback on program activities, goals, and learning environments.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

REFERENCED PROCEDURES

1. The ERSEA Manager is responsible for preparing handouts of the Parent Interest Survey for staff to complete with parents.
2. The FA should discuss and have parent/guardian complete the survey at intake or during the first 30 days of school.
3. The Family Advocate is responsible for forwarding accumulated survey results to the ERSEA Manager.
4. The Family Service team will then meet to determine the training calendar of events based on the results of the survey.
5. The Family Service team will develop a monthly training calendar based on the survey results.

Procedure Title,	Parent Education and Employment		
Procedure Number:	15.14	Effective Date:	October 1, 2018
Policy Title Reference:	Parent Education and Employment		
Sub procedures			
Regulation References:			
Forms:	III		III
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

Opportunities will be provided to assist enrolled families in Identifying and securing access to continuing education, training, and employment opportunities.

DEFINITIONS

N/A

REFERENCED PROCEDURES

1. Early Head Start will assist families in researching and identifying local educational and skills training programs in the community.
2. Family Advocates will help the center to participate in Family Literacy activities for the families and community.
3. Family Advocates will use the Parent Interest Survey to plan educational and/or employment training opportunities for parents.
4. Family Advocates will assist families in accessing materials, services, and activities essential to family literacy development.
5. Family Advocates will assist parents appropriately during the Family Partnership Agreement process and goal setting visit to recognize and address their own family goals.

Procedure Title:	Parent Handbook		
Procedure Number:	15.15	Effective Date,	October 1, 2018
Policy Title Reference:	Parent Handbook		
Sub procedures			
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

A Parent Handbook will be provided to families as a guide to program services and policies.

DEFINITIONS

N/A

REFERENCED PROCEDURES

1. The parent handbook will be used to orient parents to the Early Head Start Program. It provides a variety of information such as: attendance guidelines, local community resources, emergency plan, and health and medical information.
2. Parents will be given an opportunity to ask questions concerning the Parent Handbook during Parent Committee meetings and throughout the program year.
3. The Parent Handbook will provide families an overview of services being offered.
4. The EHS Parent Handbook will be available in English and in Spanish.

Procedure Title:	Parent Education and Involvement		
Procedure Number:	15.16	Effective Date:	October 1, 2018
Policy Title Reference:	Parent Education and Involvement		
Sub Procedures			
Regulation Reference: :			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

SCACAP will provide opportunities to support parental learning, involvement and interaction throughout the program year.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

REFERENCED PROCEDURES

1. Family members will be provided parent involvement and educational activities that are responsive to their ongoing and expressed needs.
2. Families will be welcomed as visitors and encouraged to observe their child at school as often as possible, and to participate with children in program activities.
3. Early Head Start will offer opportunities for parents to participate in the program as employees or volunteers. Parents must meet job description requirements for employment opportunities, and must attend Parent Volunteer Training before volunteering time in Early Head Start.
4. The following opportunities will be offered to enhance parents' knowledge and understanding of educational and developmental needs of their children:
 - a. Pedestrian, car seat and bus safety training
 - b. Child development
 - c. Family literacy development and services
 - d. Nutrition education (selection & preparation & food budgeting)
 - e. Medical and Dental Health Education (preventive medical and dental)
 - f. Mental health
 - g. Parenting techniques
 - h. Transition
 - i. Substance abuse, child abuse& neglect and domestic violence
 - j. Employment and skills training
5. Parent training opportunities will be offered to support families to influence the character and goals of those that have limited credentials, English proficiency and literacy skills.

Procedure Title:	Parent Activity Funds		
Procedure Number	15.17	Effective Date:	October 1, 2018
Policy Title Reference:	Parent Activity Funds		
Sub Procedures			
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates,			

POLICY

SCACAP will provide EHS grant funds to support parent activities.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

REFERENCED PROCEDURES

1. Parent activities requiring funds are to be discussed and approved at the Parent Committee meetings.
2. The Parent Committee Agenda must be submitted with requested purchase order to the **ERSEA** Manager.
3. The ERSEA Manager is responsible for submitting an invoice and sign in sheet from the Parent Committee meeting/activity to SCACAP Procurement for processing.
4. The Parent Activity funds cannot be used to purchase equipment or supplies for the classroom.
5. The Parent Activity account is not allowed to be carried over into the succeeding program year.

Procedure Title:	Parent Community Representative Reimbursement		
Procedure Number	15.18	Effective Date:	October 1, 2018
Policy Title Reference:	Parent Community Representative Reimbursement		
Sub procedures			
Regulation Reference:			
Forms:			
SCACAP Executive Director Approval Date,	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates;			

POLICY

SCACAP will enable income-eligible parents to participate fully in their EHS responsibilities by providing, if necessary, reimbursement to parents for reasonable expenses incurred.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships
EHS: Early Head Start

REFERENCED PROCEDURES

1. Parent/Community representative must have permission from the EHS-CCP Director prior to attending any meetings that will require reimbursement.
2. Parent/Community representative will be responsible for submitting documentation from the travel done in order to participate. This documentation must consist of, but not be limited to, hotel receipt (if applicable) or mileage sheet.
3. The EHS Program Assistant is responsible for ensuring that the parent completes and submits the forms correctly and within the appropriate period.
4. The EHS-CCP Director will be responsible for reviewing and approving the reimbursement.

Procedure Title:	Transition into Head Start or Preschool		
Procedure Number:	15.19	Effective Date:	October 1, 2018
Policy Title Reference,	Transition into Head Start or Preschool		
Sub procedures			
Regulation References:			
Forms:	III III		
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates;			

POLICY

SCACAP will involve parents/guardians in their child's transitions into and out of EHS. Every effort will be made to facilitate smooth transitions. Staff will encourage parents to be advocates for their child.

DEFINITIONS

SCACAP: South Carolina
 Association of Community Action
 Partnerships EHS: Early Head
 Start

REFERENCED PROCEDURES

1. EHS staff will assist the EHS parent/guardian in becoming an advocate for their child by providing each family with knowledge of the program and its philosophy. This will be facilitated through discussion and distribution of a parent handbook, brochures, and other printed materials at enrollment.
2. Parents and children will be encouraged to visit the Early Head Start or preschool site prior to child's first day of attendance.
3. Early Head Start will respond professionally to any parent/guardian's concerns and/or observations about their child and his/her adjustment to the Early Head Start or preschool classroom and staff.
4. Early Head Start staff will offer support and encouragement to parents and children as they work through their transition into Early Head Start or preschool. Staff will talk frequently with parent/guardian of newly enrolled children to monitor transition.
5. EHS will build relationships and partnerships with local Head Start grantees and create a transition plan.
6. Early Head Start will provide parent trainings on various topics in relation to child development, parenting, and parent's interests.
7. Early Head Start will encourage parents to share helpful information about the child's current situation and past experiences with groups of children.

16.0 Due to renumbering of an early draft. This manual contains no Section 16.

17.0 Financial Management Systems

- 17.1 Purchasing and Procurement
- 17.2 Contracts
- 17.3 Accounts Payable
- 17.4 Accounts Receivable
- 17.5 Federal Drawdown Reimbursements
- 17.6 Insurance
- 17.7 Financial Reporting
- 17.8 Administrative Cost
- 17.9 Non-Federal Resources (In Kind)
- 17.10 Single Audit
- 17.11 Oversight and Approval of Financial Management, Accounting, Reporting & Compliance
- 17.12 Cost of Living Adjustments
- 17.13 Indirect Cost
- 17.14 Identifying High Risk Concerns
- 17.15 Budget Development and Revisions

Procedure Title:	Purchasing and Procurement (SCACAP)		
Procedure Number:	17.1	Effective Date:	November 4, 2018
Sub Procedures	N/A		
Policy Title Reference:	17.1- Purchasing and Procurement (SCACAP)		
Regulation References:			
Forms:	II III		
SCACAP Executive Director Approval Date:	November 4, 2018	EHS Director Approval Date:	November 4, 2018
Revisions Dates:			

OVERVIEW

SCACAP will meet all state and federal requirements for procurement as established in the SC Department of Education's Office of Procurement Division Procedure Manual. (Reference CFR 75.326 Procurement by States)

DEFINITIONS

Procurement is the process of purchasing goods and services necessary for the organization to meet its mission and program's needs. This is done through the use of purchasing statutes, regulations and procedures established by the State of South Carolina. These statutes, regulations and procedures are to be followed when purchasing any services or goods.

PROCEDURE

SCACAP adheres to 2 CFR Part 200.318 through Part 200.324 and CFR Part 75.326 through Part 75.340 by following the office of procurement manual established by the department of education office of procurement division procedure manual. For the P-card, SCACAP policy and associated procedures should be followed.

When items are required to operate the program for South Carolina Association of Community Action Partnerships, the Procurement Manager shall ensure that all solicitations meet the standards for the SC Consolidated Procurement Code and the procedures identified in the SC Department of Education Procurement Manual. Internal to the organization, program staff will provide enough detail to allow the Procurement Manager to develop the proper documents and process to meet their needs. This should include a process that documents the approval of all appropriate persons, to include the Program Managers for any federal grants. If done through a requisition process, that process should include:

1. Specifications or statement of services required
2. Contractor name, address, point of contact and phone number if known
3. Account Code, if known
4. Delivery or performance schedules
5. Delivery, packing, and transportation requirements
6. Special conditions (if applicable)
7. Catalog number, page number, etc. (if applicable)
8. Net price per unit, less discount, if any

9. Total amount of order

10. Date purchase requisition was prepared

11. Maintain records sufficient to detail the history of procurement, including: (2CFR 200.318(i))

- Rationale for the method of procurement
- Selection of contract type
- Contractor selection or rejection; and
- The basis for the contract price
- Approval of necessary organization managers

12. All purchases and expenditures are reasonable, necessary, allowable, and allocable, documented and approved by appropriate individuals before purchase.

The most efficient and appropriate method of procurement should be used. This would include using a procurement card, or P Card. The SCACAP policy for P Card should be used at all times. This includes both the items that can be purchased and who has the authority to commit the agency for those purchases.

Some purchases are above the level of SCACAP staff to commit. In these cases, appropriate staff at the State Department of Education or the Division of Materials Management Office should assist to ensure consistency with the SC Consolidated Procurement Code.

All reporting requirements, both by statute, and by regulation for purchasing will need to be met. In accordance with the requirements of the State Policy Review Board for Early Head Start, all P-Card purchases for the EHS Program will be reported to the appropriate governing authority at the time specified by the requirement.

Procedure Title :	Contracts (SCACAP)		
Procedure Number,	17.2	Effective Date:	November 4, 2018
Sub Procedures	N/A		
Policy Title Reference:	17.1- Purchasing and Procurement (SCACAP)		
Regulation References:	2 CFR Part 200.318(b), Appendices II to CFR 75		
Forms			
SCACAP Executive Director Approval Date:	November 4, 2018	EHS Director Approval Date:	November 4, 2018
Revisions Dates:			

OVERVIEW

SCACAP will follow the requirements of the SC Consolidated Procurement Code for purchase of all services and goods. This will include any requirements for contracting for the provision or purchase any services or goods. Contracting includes memoranda of agreement, where funds usually do not change hands. SCACAP, as a Grantee for the Early Head Start Partnership Grant will follow 2 CFR 318(c) (1) in relation to the use of the SC state procurement code. To meet the requirements in Appendix II Part of CFR 75 & and 200.31(b), language outlined in Procedure 17.2 will be included in contracts for SCACAP Early Head Start and other federal grants as required.

DEFINITIONS

SCACAP: South Carolina
 Association of Community Action
 Partnerships CFR: Code of
 Federal Regulations

CONTRACTS: Contracts are documents between two parties expressing the intent and requirements of each party.

PROCEDURE

Any contracts entered into by the SCACAP will include four steps. These will include the following:

1. **Development:** Spell out the scope of services, which will clarify who will do what for whom within specific time frames. This will be developed by the program manager who will be managing and monitoring the agreement.
2. **Approval:** Once the agreement is drafted, the Procurement Manager, and appropriate Senior Management staff will have to approve each contract. This would include the Deputy Director, and the COO/CFO. The Executive Director, through delegated authority from the Chair of the Board of Trustees, will have primary authorization to sign and commit the organization. The Deputy Director and the COO/CFO will have delegated authority in situations where the Executive Director is not available, in that order.
3. **Monitoring:** The appropriate Program Manager or the person who is the lead contact for the agreement will monitor all contract deliverables. This will include ensuring that all deliverables are met within the required time frames.
4. **Review:** All contracts will be reviewed upon their completion prior to any last payments being paid, in the case of a contract where money changes hands. This should include documentation that all deliverables have been met.

Specific Programs may have specific language that may need to be included in contracts or legal documents.

EARLY HEAD START- CHILD CARE PARTNERSHIP

Any agreements between Early Head Start Program and another entity will have the following requirements:

Contracts for more than the simplified acquisition threshold currently set at **\$150,000**, which is the inflation adjusted amount determined by the Civilian Agency Acquisition Council and the Defense Acquisition Regulations Council (Councils)

As authorized by 41 U.S.C. 1908, must address administrative, contractual, or legal remedies in instances where contractors violate or breach contract terms, and provide for such sanctions and penalties as appropriate.

All **contracts** in excess of **\$10,000** must address termination for cause and for convenience by the non-Federal entity including the manner by which it will be affected and the basis for settlement.

Equal Employment Opportunity Except as otherwise provided under 41 CFR part 60, all contracts that meet the definition of "federally assisted construction contract" in 41 CFR part 60-1.3 must include the equal opportunity clause provided under 41 CFR 60-1.4(b), in accordance with Executive Order 11246, Equal Employment Opportunity (30 FR 12319, 12935, 3 CFR 1964-1965 Comp., p. 339) as amended by Executive Order 11375 amending Executive Order 11246 Relating to Equal Employment Opportunity, and implementing regulations at 41 CFR part 60.

Davis-Bacon Act, as amended (40 U.S.C. 3141-3148). When required by Federal program legislation, all prime construction contracts in excess of \$2,000 awarded by non-Federal entities must include a provision for compliance with the Davis-Bacon Act (40 U.S.C. 3141-3144, and 3146-3148) as supplemented by Department of Labor regulations (29 CFR part 5). In accordance with the statute, contractors must be required to pay wages to laborers and mechanics at a rate not less than the prevailing wages specified in a wage determination made by the Secretary of Labor. In addition, contractors must be required to pay wages not less than once a week. The non-Federal entity must place a copy of the current prevailing **wage** determination issued by the Department of Labor in each solicitation. The decision to award a contract or subcontract must be conditioned upon the acceptance of the wage determination. The non-Federal entity must report all suspected or reported violations to the Federal awarding agency. The contracts must also include a provision for compliance with the Copeland "Anti-Kickback" Act (40 U.S.C. 3145), as supplemented by Department of Labor regulations (29 CFR part 3). The Act provides that each contractor or sub-recipient must be prohibited from inducing, by any means, any person employed in the construction, completion, or repair of public work, to **give** up any part of the compensation to which he or she is otherwise entitled. The non-Federal entity must report all suspected or reported violations to the Federal awarding agency.

Contract Work Hours and Safety Standards Act (40 U.S.C. 3701-3708). Where applicable, all contracts awarded by the non-Federal entity in excess of \$100,000 that involve the employment of mechanics or laborers must include a provision for compliance with 40 U.S.C. 3702 and 3704, as supplemented by Department of Labor regulations (29 CFR part 5). Under 40 U.S.C. 3702 of the Act, each contractor must be required to compute the wages of every mechanic and laborer based on a standard workweek of 40 hours. Work in excess of the standard workweek is permissible if the worker is compensated at a rate of not less than one and a half times the basic rate of pay for all hours worked in excess of 40 hours in the workweek. The requirements of 40 U.S.C. 3704 are applicable to construction work and provide that no laborer or mechanic must be required to work in surroundings or under working conditions, which are unsanitary, hazardous or dangerous. These requirements do not apply to the purchases of supplies or materials or articles ordinarily available on the open market, or contracts for transportation or transmission of intelligence.

Rights to Inventions Made Under a Contract or Agreement. If the Federal award meets the definition of "funding agreement" under 37 CFR 401.2 (a) and the recipient or sub-recipient wishes to enter into a contract with a small business firm or nonprofit organization regarding the substitution of parties, assignment or performance of experimental, developmental, or research work under that "funding agreement," the recipient or sub-recipient must comply with the requirements of 37 CFR part 401 and any implementing regulations issued by the awarding agency.

Clean Air Act (42 U.S.C. 7401-7671q.) and the Federal Water Pollution Control Act (33 U.S.C. 1251-1387), as amended-Contracts and sub grants of amounts in excess of \$150,000 must contain a provision that requires the non-Federal award to agree to comply with all applicable standards, orders or regulations issued pursuant to the Clean Air Act (42 U.S.C. 7401-7671q) and the Federal Water Pollution Control Act as amended (33 U.S.C. 1251-1387). Violations must be reported to the Federal awarding agency and the Regional Office of the Environmental Protection Agency (EPA).

Debarment and Suspension (Executive Orders 12549 and 12689)-A contract award (see 2 CFR 180.220) must not be made to parties listed on the government-wide exclusions in the System for Award Management (SAM), in accordance with the OMB guidelines at 2 CFR part 180 that implement Executive Orders 12549 (3 CFR part 1986 Comp., p. 189) and 12689 (3 CFR part 1989 Comp., p. 235), "Debarment and Suspension." SAM Exclusions contains the names of parties debarred,

suspended, or otherwise excluded by agencies, as well as parties declared ineligible under statutory or regulatory authority other than Executive Order 12549.

Byrd Anti-Lobbying Amendment (31 U.S.C. 1352)-Contractors that apply or bid for an award exceeding \$100,000 must file the required certification. Each tier certifies to the tier above that It will not and has not used Federal appropriated funds to pay any person or organization for influencing or attempting to influence an officer or employee of any agency, a member of Congress, officer or employee of Congress, or an employee of a member of Congress in connection with obtaining any Federal contract, grant or any other award covered by 31 U.S.C. 1352. Each tier must also disclose any lobbying with non-Federal funds that takes place in connection with obtaining any Federal award. Such disclosures are forwarded from tier to tier up to the non-Federal award.

CONTRACT ADMINISTRATION (2 CFR Part 200.318(b))

SCACAP Early Head Start is required to have policies and procedures on contract administration.

CONTRACT ADMINISTRATION

FILES SHALL BE MAINTAINED:

- All Contracts will be kept in the Procurement Officer's Files

CONTRACT ADMINISTRATION FILES SHALL CONTAIN:

- The required documentation specified in the authorizations and purchasing limits tables for the original scope of work and for all amendments.
- Where the contract work is identified in the appropriate grant award or budget, if required, the identification and scope of the work contained in the award or budget, and all approved budgets.

AUTHORIZATION OF WORK:

- No work shall be authorized until the contract for the work has been approved and fully executed.
- No change in the work shall be authorized until an amendment to the contract for the work has been approved and fully executed, except as permitted for Special Purchasing Conditions.
- No amendment of a contract for work shall be executed until It has been approved and authorized by the CFO/COO of South Carolina Association of Community Action Partnerships, Executive Director, Deputy Director, Director of Program, and Agency Attorney where required by the terms of the grant award or budget, approval by the funding source.

CONFORMANCE OF WORK

For each grant award based on the applicable laws, regulations and grant provisions, the Fiscal manager/Designee shall establish and maintain a system to reasonably assure contractor:

- Maintains conformance with the terms, conditions, and specifications of the contract, and
- Will conduct timely follow-up of all purchases to assure such conformance and adequate documentation.

The Fiscal Manager/Designee will authorize payment of invoices to contracts after final approval of work completed.

Procedure Title:	Accounts Payable (SCACAP)		
Procedure Number:	17.3	Effective Date:	November 4, 2018
Sub Procedures	N/A		
Policy Title Reference;	17.3-Accounts Payable (SCACAP)		
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	November 4, 2018	EHS Director Approval Date:	November 4, 2018
Revisions Dates:			

OVERVIEW

SCACAP strives to maintain efficient business practices and optimal cost control. A well-managed accounts payable function can assist in accomplishing this goal from the purchasing decision through payment and bank reconciliation. The Accounts Payable section of the Office of Finance will process financial documents in a timely and accurate manner while providing fiscal control through its procedures and adhering to all state, federal, and agency policies. The following are general policies for accounts payable:

- Disbursements are properly authorized,
- Invoices are processed in a timely manner, and
- Contractor credit terms and operating cash are managed for maximum benefits.

DEFINITIONS

SCACAP: South Carolina Association of Community Action Partnerships

PROCEDURE

Accounts Payable is responsible for a variety of functions associated with the process of making payments to vendors and employees. The section performs data entry of invoices and travel reimbursements. In addition, the AP provides customer service regarding all facets of the payment process to vendors and agency staff. All invoices and reimbursements are to be paid within the lessor of thirty (30) days from the receipt of the goods or services or the due date of the invoice. In case of a dispute or vendor error, the 30-day period will begin upon the resolution of the dispute or receipt of a corrected goods or services. In order to ensure payment within 30 days, the payment process of each invoice will begin within **five (5)** days of the receipt of the invoice or travel reimbursement.

The Accounts Payable Section will not process payment of invoices that have been manually increased for any reason other than sales taxes. An invoice can be processed for a manually reduced invoice upon the approval of the vendor.

Interest/late fees (except as stated in section 11-35-45 of the South Carolina 1976 Code of Laws), federal tax, and balance forward charges are deducted from all invoices and only current charges are processed for payment. Only one invoice will be processed at a time to avoid duplicate payments. Invoices that have dates or service/delivery dates that are earlier than the date of the corresponding PO must have a ratification letter attached to the PO or the Office of Purchasing must notate their payment approval in the PO header text.

Procedures

- A. Logistics Payments-Invoices that require matching to purchase orders and goods receipts.

1. Invoices are scanned and assigned to the Business Workplace of each AP technician and can be accessed under the Workflow tab. All invoices should be processed within five (5) business days. Invoices that are not processed within the 5 days must have a note attached explaining why the invoices has not been processed. Double clicking on the assignment will bring up an image of the invoice and open the processing box to launch the invoice into the proper transaction (MIRO). See Figure 1 below.
2. Review invoice Click and goods receipt to ensure quantities, unit prices, sales tax and total prices are correct. Invoices can be entered without the goods receipt but the receiving party should be notified to post the goods receipt as soon as possible. Price differences should be routed to the Procurement for resolution before the invoice is entered except at year-end when it should be entered as soon as possible. If the invoice or the receipt of goods date is earlier than the date of the PO, a ratification letter must be attached to the PO or the Procurement person must notate their approval in the PO header text. Enter invoice information in transaction MIRO as follows:

Basic Tab Data

Posting Date	Defaults to current date. Do not change unless posting in extended year-end period 12.
Invoice Date	Date on Invoice
Reference	Enter Invoice # exactly as it appears. Note: If no invoice number is available, please enter in the following hierarchy: (1) Account # (2) Date(s) of service, (3) Invoice date. Dates are entered in the slash format, e.g. 1/07/16 or 1/07/16-1/09/16.
Amount	Enter total amount of invoice
Calculate tax	Always check box and enter tax calculation from the drop-down box as applicable: I0-notax on invoice and not subject to use or sale tax, I-Tax amount will be calculated by system. If system calculation is incorrect, uncheck box and enter the correct tax amount. 1-tax on invoice, U1-Out of state vendor, no tax on invoice, subject to use tax
Tax Amount	Tax amount will be calculated by system. If system calculation is incorrect, uncheck box and enter the correct tax amount.
Text	Additional information such as date of service
Purchase Order/	Enter Purchase order# and press enter; the vendor and information from the PO will populate appropriate fields.
Line Item Details	<i>Amount-Enter</i> invoice amount. Exclude taxes and exclude shipping if there is no line item on the PO for shipping. Note: Invoice amounts cannot be manually increased except in the case of tax calculation errors. Invoices can be manually reduced after notifying vendor. <i>Quantity-Enter</i> or verify quantity from invoice. If PO is a Blanket PO, the quantity is always equal to the amount. <i>Tax Code-Defaults</i> from PO. Verify or match to header tax code.

General Ledger Acct-Verify code. If incorrect, contact the Procurement Office to change.
 Final Invoice-Scroll to the right to find field and check only if processing the last payment on the PO to release encumbrance.
 Text-Enter employee# for travel related Pos.

Payment Tab Data

Baseline Date	Calculates payment terms
Payment Terms	Calculated from the vendor file. Click dropdown box to change as needed to either 001-Pay immediately or ZSPE- Need check on next business day
Payment Method	Defaults to vendor file records. Maybe changed to S if a single check is required.

Details Tab

Unpl Del Costs	Enter shipping/handling/delivery fees only if there are no line items for these charges on PO
Invoice Party	Change if the remittance address does not match the remittance address on the invoice. Note: Only vendor #s with the same FEIN number as that of the PO can be entered.

3. After entering all required information click the simulate button to review the transaction and click the back button to return to the main screen and check the message indicator. The message box should always be reviewed if the indicator is red (critical error-invoice will not post until corrected) or yellow (warning-invoice will post with cautions). If the message indicator is green or yellow, click the button **II** to post the invoice and obtain a document number. If the message, document no 57xxxxxxx created (Blocked for payment) is received, a price or quantity variance block has been placed on the invoice and it will not workflow to the CG's office for approval until the variance is corrected. Invoices rejected by the CG's office are automatically cancelled and cleared. The invoice must be re-scanned and re-processed with any necessary corrections.
4. Blocks will be placed on an invoice if the invoice price is not less than or equal to the PO price and/or the invoice quantity is not less than or equal to the PO/Goods receipt quantity. Blocked invoices can be reviewed by running the transaction ZMRBR. See figures five (5) and six (6). The report will indicate whether the invoice has a price and/or quantity variance. Analyze the variance to determine the corrective action needed, i.e., Procurement price correction of PO, posting of a goods receipt by the receiving office, or canceling the invoice with transaction **MR8M** and F-44. All blocks must be cleared within five (5) business days. Invoices that have not cleared within the 5 days must have a note attached explaining why the invoices has not cleared.

B. Direct Payments-Payments to vendors that do not require Purchase Orders. (See Comptroller General's policy on the use of PO and Direct expenditures for guidance at www.ca.sc.gov/guidanceandformsforstateagencies .

1. Direct Pay invoices are scanned and assigned to the Business Workplace of each AP technician and can be accessed under the Workflow tab. All invoices should be processed within **five (5) business days**. Invoices that are not processed within the **five (5) days** must have a note attached explaining why the invoices have not been processed. Double clicking on the assignment will bring up an image of the invoice and open the processing box to launch the invoice into the proper transaction (FV60).
2. All direct pay invoices must be approved, signed, and coded by the receiving office. Enter the invoice information in transaction FV60 the same as in MIRO except that there is no purchase order to enter and all line item detail information is obtained from the invoice and entered as follows:

Line Item Details	<i>General Ledger Account</i> -Enter correct GL for the expenditure <i>Amount</i> -Enter invoice amount. Exclude taxes and shipping. Note: Invoice amounts cannot be manually increased except in the case of tax calculation errors. Invoices can be manually reduced after notifying vendor. <i>Cost Center, Functional Area, Fund, Grant</i> -Enter funding information from invoice <i>Tax Code</i> : Verify or match to header tax code. <i>Text</i> -Enter employee# for travel related payments.
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3. After entering all required information, click the simulate button to review the transaction and click the back button to return to the main screen and check the message indicator. The message indicator must be green and the balance must equal zero in order for the document to workflow to the AP lead and then to the CG's office. Click the save **as completed** button to obtain a document number and start the workflow approval process.
 4. Documents that have work flowed to the AP lead have not yet posted and can be corrected or deleted using transaction FBV2 if rejected. Documents that have work flowed to the CG are posted documents and will be automatically reversed if rejected by the CG. The invoice must be rescanned and re-entered with the necessary changes if necessary.
- C. Travel-Reimbursements to state employees, registrations paid to vendors on behalf of state employees, and board member reimbursements **Note: Non-state employee travel is processed using transaction FV60.**

1. Travel documentation is scanned and assigned to the Business Workplace of each AP technician and can be accessed under the Workflow tab. All transactions should be processed within five (5) business days. Documentation that has not processed within the 5 days must have a note attached explaining why it has not been processed. Double clicking on the assignment will bring up an image of the Invoice and open the processing box to launch the invoice into the proper transaction (ZTRAVEL). See Figure 8 below.
2. If applicable, a Travel Request Authorization (TRA) must be completed and approved in advance of the travel and attached to the reimbursement travel form. State Travel Form (13-6) and Non-State Travel Form (13-7) must be properly completed, signed by the employee seeking reimbursement of travel expenses and include all applicable supporting documentation. The employee's director or designee must also sign the forms. The forms

must be audited by the fiscal technicians responsible for travel reimbursements to assure mathematical accuracy and adherence to State and Department policies and procedures. Any and all changes made to the travel form must be initialed by the individual making the adjustments.

3. SCACAP will also pay vendors for advance registration fees and airline tickets for employees charged to the Bank of America **(BOA)** Purchasing card. The registration fee form, agenda, and TRA are required in order to process payments for registration fees. The BOA invoice, TRA, and Procurement certification are required for processing payments for airline tickets.
4. The steps for entering the invoice information in transaction ZTRAVEL are similar to those in FV60 except that all line item detail information is obtained from the TRA, travel form, or invoice. Enter information as follows:

Vendor	SAP Employee Vendor number for state employee travel reimbursements or SAP vendor number for vendor travel.
Invoice Date	Invoice date or date of travel
Reference	Date(s) if travel in 01/11/1111 format for reimbursements or invoice # for vendor travel
Amount	Total amount
Text	Any additional information about the expenditure
Line Item Details	<i>General Ledger Account</i> -Enter correct GL for the expenditure <i>Amount</i> -Enter invoice amount for each GL. Exclude taxes and shipping. <i>Cost Center, Functional Area, Fund, Grant</i> -Enter funding information from TRA or travel form <i>Text</i> -Enter SAP employee #. <i>Quantity</i> -Enter # of miles for mileage reimbursements GL 5050040000/5050540000, enter number of trips for airline travel GL 5050530000. <i>Base unit of Measurement</i> -Enter MI for mileage reimbursements and TR for airline travel.

5. After entering all required information, click the simulate button to review the transaction and click the back button to return to the main screen and check the message indicator. The message indicator must be green and the balance must equal zero in order for the document to workflow to the AP lead and then to the CG's office. Click the **save as completed** button to obtain a document number and start the workflow approval process.
6. Documents that have workflowed to the AP lead have not yet posted and can be corrected or deleted using transaction FBV2 if rejected.

D. IDTs - Payments to Live State Agencies

1. IDT invoices must be approved by the receiving office before being processed for payment. Most IDT invoices are approved through the Funds Reservation (FR) process or by signing, and coding the invoice.
2. To process invoices from state agencies on SAP (Live), launch transaction Z_IDT_DOCLIS. A list of outstanding invoices for the agency will appear for processing. See Figure 9.
3. Double click the document number to bring up the document for processing and then click on the Services for Object tab bring up the attachment list to view the invoice. Most of the Basic data information will already be populated but the posting date, amount (decrease only), and text fields can be adjusted if necessary. Enter remaining information as follows:

G/LAcct Must be changed to the correct GL for the invoice. If paying from a FR, the default GL must be replaced with the same FR GL # and saved in the document before entering the FR#.

Amount Amount of invoice. Under rare circumstances, the invoice amount may be reduced. The reason for the reduction must be clearly documented by note or attachment. A new document with the remaining balance of the invoice will appear on the IDT Document list the next day.

Line Item Details *General Ledger Account*-Must be changed to the correct GL for the invoice. If paying from a FR, the correct GL for the FR must be saved in the document before entering the FR#.
Amount payable. Under rare circumstances, the amount invoice amount may be reduced. The reason for the reduction must be clearly documented by note or attachment. A new document with the remaining balance of the invoice will appear on the IDT Document list the next day
Cost Center, Functional Area, Fund, Grant-Enter funding information from approval documentation. If paying from a FR, these fields will populate after the FR# has been entered.
Text-Enter SAP employee# if invoice is travel related.
Earmarked Funds-Enter FR #
Earmarked Funds Doc Item-Enter FR line#
(Default is 1)

4. After entering all required information, click the simulate button to review the transaction and click the back button to return to the main screen and check the message indicator. The message indicator must be green and the balance must equal zero in order for the document to workflow to the AP lead and then to the CG's office. Click the **save as completed** button to obtain a document number and start the workflow approval process.

E. IDTs - Payments to Non-Live State Agencies

1. IDT invoices are scanned and assigned to the Business Workplace of each AP technician and

can be accessed under the Workflow tab. All transactions should be processed within 5 business days. Documentation that has not processed within the 5 days must have a note attached explaining why it has not been processed. Double clicking on the assignment will bring up an image of the invoice and open the processing box to launch the invoice into the proper transaction (ZIDT). See Figure 11.

2. The steps for entering the invoice information in transaction ZIDT are similar to those in FV60 except that all line item detail information is obtained from the invoice or Funds Reservation (FR). In addition, an IDT form with the receiving agency's STARS information is also required. Enter information as follows:

Vendor Enter the alphanumeric number for the non-live agency.

Invoice Date Invoice date

Posting Date Defaults to current date

Reference Enter Invoice #

Amount Total amount of invoice

Text Any additional information about the expenditure

Line Item Details *General Ledger* Account-Enter correct GL for the expenditure. If paying from a FR, this field will automatically populate after entering the **FR#**.
Amount-Enter invoice amount.
Cost Center, Functional Area, Fund, Grant-Enter funding information from invoice. If paying from a FR, these fields will automatically calculate when the FR# is entered.
Text-Enter SAP employee# if invoice is travel related.

3. After entering all required information, clicking the simulate button to review the transaction and then click the back button to return to the main screen and check the message indicator. If the message indicator is green and the balance is zero, click the **Save as completed** button to bring up a separate screen to enter the STARS information. The required STARS fields for non-live agencies are:

- Trans Code
- Agency Code
- Mini Code
- Sub-fund
- Agency Ref Code
- Object
- Amount

After entering the required information, click the **save as completed** button to obtain a document number and start the workflow approval process.

Accounts Payable Reference Items

A. Transaction Codes

T-Code	Use
FV60	Process Direct Pays and Non-State Travel
MIRO	Process Purchase Order Invoices
FV65	Process Credit Memo's
ZTRAVEL	Process Travel for State Employees
ZIDT	Process IDTs
Z IDT DOCLIST	View lists of IDTs for Processing
FBV3	View Parked Documents
FBV2	Edit Parked Document
FB03	View Posted Document
FB02	Change Posted Document
FB08	Reverse Direct Pays, IDTs, and Travel
MR8M	Reverse Purchase Order Invoices
F-44	Clear Vendor Side of Purchase Order after Reversal
ME23N	View Purchase Orders
ZMRBR	View Blocked Invoices
FMX3	View Fund Reservations
ZFCHI	Display Check Information
FBIIN	View Vendor line Items
MIRS	Display list of Invoice Documents

B. Accounts Payable Document Types

Document Type	Definition	Sequence Number
KR	Vendor Invoice (Direct Pay)	3xxxxxxxxx
RE	logistics Invoice (Purchase Order)	57xxxxxxxx
ZT	Travel	35xxxxxxxx
ZI	IDT	39xxxxxxxx
KI	Direct Pay(interface)	3xxxxxxxxx
ZP	Payment Posting (Clearing Document)	34xxxxxxxx
KG	Direct Pay Credit	33xxxxxxxx

Procedure Title:	Accounts Receivable (SCACAP)		
Procedure Number:	17.4	Effective Date:	November 4, 2016
Sub Procedures	N/A		
Policy Title Reference:	17.4-Accounts Receivable (SCACAP)		
Regulation References:			
Forms,			
SCACAP Executive Director Approval Date:	November 4, 2016	EHS Director Approval Date:	November 4, 2016
Revisions Dates,			

OVERVIEW

The Accounts Receivable (AR) section within the SCACAP Office of Finance will record, receipt, secure, and deposit all SCACAP funds received from the sale of goods, fees, fines, refunds, registrations, and all other agency functions in accordance with state and federal rules and regulations.

DEFINITIONS

SCACAP: South Carolina
 Association of Community Action
 Partnerships AR: Accounts
 Receivable

PROCEDURE

Deposit Preparation

All cash and checks are counted when received and verified. I then prepare my deposit ticket and give it to the AR Lead for approval.

The deposit slips, and all funds are placed in the bank deposit bag. I then carry the bank bag to the bank for deposit. The bank will deposit the funds and return the deposit bag containing two validated deposit slips. I always check the deposit receipt to make sure it is correct before I leave the bank.

A. SCEIS Entries

1. Non-Accounts Receivable Receipts

Non-AR receipts are not entered in SCEIS until after funds are deposited in the bank. Enter non-AR receipts using transaction code ZREV (See Figure 1) as follows:

Document Date Must equal date of deposit

Posting Date Defaults to current date

Reference

Enter physical receipt#

Doc Header Text Enter physical receipt #and office receipt #s if applicable

Document Type Enter **SK** for cash retire document

Text Additional information such as date of service

Credit Line Item Details:

G/LAcct. Enter GL code identifying the type of revenue

D/C- Click Credit

*Amount-*Enter amount of receipt.

Cost Center, Functional Area, Fund, Grant- Enter funding information from transmittal sheet

Text- Enter employee# for travel related refunds or other identifiers as needed.

Debit Line Item Details

G/LAcct- Enter 1000010301 (SCDE's offsetting cash account)

D/C- Click Debit

2. Accounts Receivable Billings

Transmittal sheets and invoices are received from program offices and are scanned and assigned to the Business Workplace of the AR technician and can be accessed under the workflow tab. Double clicking on the assignment will bring up the images and open the processing box to launch the invoice into the proper transaction FB70. AR billings are entered in SCEIS as follows:

Customer#	Enter customer# for the customer billed
Invoice date	Enter date of invoice in the dd/mm/yyyy format.
Posting date	Defaults to current date
Reference	Enter an asterisk (*)
Document Type	Defaults to DR for Customer Invoice
Amount	Enter amount of Invoice
Text	Enter identifying information as needed
Line Item Details <i>G/L-</i>	Enter correct account code Amount-Amount of refund <i>D/C-</i> Click CR for Credit <i>Business Area-</i> Enter H630

Cost Center, Functional Area, Fund, Grant- Text	Enter funding information from transmittal sheet Enter identifying information as needed.
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3. Posting Payment Receipts of Outstanding Receivables

Use transaction ZAR_REV to post a payment to clear an open receivable as follows:

Document Date	Date validated on the physical deposit slip
Posting Date	Defaults to current date
Reference	Enter the receivable document number
Bank Data Account	Enter 1000010301(SCDE's undeposited cash account)
Amount	Enter the amount received
Open Item Account	Customer account number
Additional Selection	Click Document Number

Review amounts and click the button to post the payment and clear the open receivable.

A SCEIS receipt 2100 * series document number will be generated. This number is then written on the physical receipt for reference and filed until all the receipts in the total deposit have been approved by the AR Lead. After approval, the physical receipt and all supporting documentation is attached by late scan to the SCEIS this receipt document.

4 . Posting Deposits to the State Treasurer's Office

The validated bank deposit slip is scanned and assigned to the Business Workplace of the AR technician and can be accessed under the Workflow tab. Double clicking on the assignment will bring up an image of the deposit slip and open the processing box to launch the deposit into the proper transaction F--04

Post a deposit or wire in SCEIS and submit to the AR Lead for approval and submission to the State Treasurer's office as follows:

Document Date	Date validated on the physical bank deposit slip
Document Type	ZD for a deposit or ZW for a wire
Reference	Enter STO Bank Account Code 03100011
Document Header Text	Enter the physical receipt number(s) included in the deposit.

Click the Transfer posting with clearing **radio** button and complete the following fields:

PstKy Enter the 40 debit post key for posting to the General Ledger

Account Enter the general ledger code 1000030000 (Cash on Deposit-STO)

Click the Choose open items button to launch the next screen

Enter the total amount of the deposit and then click the *Choose Open Items* button to launch the next screen.

Under the *Open Item selection* enter SCACAPs undeposited cash account# 100001030. Under *Additional selections* click on the Document Date radio button and then click the *Process open items* button to launch the next screen.

Enter the date on the validated deposit slip and click the *Process open items* tab to launch the next screen

Verify that the total amount of the deposit agrees with the amounts displayed on the Amount entered and the Assigned tabs. The Note assigned tab must display -0-. Click the **B** button to launch the next screen and generate a deposit number.

A deposit document type ZD generates a 1300* series document number and a wire document type Z:W generates 1400" series document number. The generated deposit # indicates that the deposit has been posted and sent to the AR lead for approval.

5. AR Lead Approval of Deposits and Wires

The posted deposit will workflow to the AR lead for approval and can be accessed under the Workflow tab. Double clicking on the assignment will display the document for review and approval. The AR Lead will reconcile the bank deposit slip to both the deposit log and to the yellow receipt copies in the official receipt book. All totals must agree. The individual receipts included in the total deposit must also be reviewed in order to assure coding and signature integrity. After a thorough review of the deposit information, the AR lead will have the options to either approve the deposit which will then workflow the deposit to the State Treasurer's office for final approval, reject the deposit which will reverse the deposit document and workflow back to the AR technician for corrections and re-submission, or hold document for further clarification

B. Interdepartmental (IDT) Billings

The billing to other state agencies for goods or services requires an invoice and a completed IDT transmittal from the requesting office. The transmittal sheets, invoices, and any other supporting are scanned and assigned to the Business Workplace of the AR technician and can be accessed under the Workflow tab. Double clicking on the assignment will bring up the images and open the processing box to launch the billing into the proper transaction ZARIDT. IDT billings are entered in SCEIS as follows:

Customer# Enter customer # for the agency

Invoice date Enter date of invoice in the dd/mm/yyyy format.

Posting date Defaults to current date

Reference Enter an asterisk (*)

Document Type Defaults to ZJ for IDT Invoice billing

Amount Enter amount of invoice

Text Enter identifying information as needed

Line Item Details *G/L* Enter correct account code
Amount-Amount of invoice
D/C-Click CR for Credit
Business Area-Enter H630

Cost Center, Functional Area, Fund, Grant- Enter funding information from the transmittal sheet

Text-Enter identifying information as needed.

To complete the process for billing for non-live agencies, and IDT form must be generated and mailed to the paying agency.

Procedure Title:	Federal Drawdown Reimbursements		
Procedure Number:	17.5	Effective Date:	November 4, 2018
Sub Procedures	N/A		
Policy Title Reference:	17.S - Federal Drawdown Reimbursements		
Regulation References,			
Forms:			
SCACAP Executive Director Approval Date:	November 4, 2018	EHS Director Approval Date:	November 4, 2018
Revisions Dates:			

OVERVIEW

SCACAP will expend and account for Federal awards in accordance with state laws and procedures for expending and accounting for the state's own funds. Payments are governed by Treasury, State CMIA agreements and default procedures codified at 31 CFR Part 205 "Rules and procedures for efficient Federal-State Funds Transfers," and RFM 4A-2000 "Overall Disbursing Rules for All Federal Agencies." In addition, the state's and the other non-Federal entity's financial management systems, including records documenting compliance with Federal statutes, regulations, and the terms and conditions of the Federal award, must permit the preparation of reports required by general and program specific terms and conditions; and the tracing of funds to a level of expenditures adequate to establish that such funds have been used according to the Federal statutes, regulations, and the terms and conditions of the Federal award.

DEFINITIONS

SCACAP: South Carolina
Association of Community Action
Partnerships AR: Accounts
Receivable
CFR: Code of Federal Regulations

PROCEDURE

SCACAP Director of Finance and Audit is responsible for the drawdown of cash based on the cash deficit in SCEIS. The following steps are followed:

Federal Drawdown/Reimbursements:

The U.S. Dept. of Education (DOE) is the granter for Part C, BabyNet, and the U.S. Dept. of Health and Human Services (DHHS) is the granter for the Early Head Start-Child Care Partnership Grant. The following is pathway to obtaining reimbursement from the US DOE:

- o Determine cash deficit in SCEIS by generating the cash balance report
- o For Part C BabyNet: Access the DOE website at: <https://www.gS.gov>
- o For EHS-CCP: Access the DHHS website at: <https://www.dpm.psc.gov>
- o Enter amount to drawdown and print confirmation

- o Prepare a cover letter and attached the following:
 - SCEIS cash balance report
 - DHHS or DOE drawdown confirmation
- o Give the cover letter and attachments to Accounts Receivable Specialist to enter into SCEIS as new

revenue

- 0 This is a continuous cash management process

Procedure Title,	Insurance		
Procedure Number	17.6	Effective Date:	November 4, 2018
Sub Procedures	N/A		
Policy Title Reference:	1 7.6 - insurance		
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date;	November 4, 2018	EHS Director Approval Date:	November 4, 2018
Revisions Dates:			

POLICY

As an entity within the State of South Carolina, South Carolina Association of Community Action Partnerships is insured under State of South Carolina Insurance Reserve Fund.

DEFINITIONS

South Carolina Association of Community Action Partnerships maintains adequate insurance for general liability, as well as coverage for buildings, contents, computers, machinery, and other items of value through the South Carolina Insurance Reserve Fund.

REFERENCED PROCEDURES

For any item purchased which requires insurance notice is provided to the South Carolina Insurance Reserve Fund, per their guidelines. The Insurance Reserve Fund adds the item to the insurance policy. The insurance coverage is reviewed and renewed annually to ensure that adequate coverage is maintained.

Procedure Title:	Financial Reporting		
Procedure Number	17.7	Effective Date:	November 4, 2018
Sub Procedures	N/A		
Policy Title Reference:	17.7 - Financial Reporting		
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	November 4, 2018	EHS Director Approval Date:	November 4, 2018
Revisions Dates:			

POLICY

Preparing financial statements and communicating key financial information is a necessary and critical accounting function. Financial statements are management tools used in making sound decisions in monitoring the achievement of financial objectives, and as a standard method for providing information to interested parties external to the Organization. Financial statements may reflect year-to-year historical comparisons or current year budget-to-actual comparisons. Financial statements may take the form of ad-hoc reports for specific programs or for specific purposes, outside the standard set of financial statements indicated for accounting purposes.

DEFINITIONS

Statement of Financial Position - Reflects assets, liabilities, and net assets of the Organization and classifies assets and liabilities as current or noncurrent/long-term and net assets by category (unrestricted, temporarily restricted, and/or permanently restricted.)

Statement of Activities - Presents support, revenues, expenses, and other changes in net assets of the Organization, by category of net asset (unrestricted, temporarily restricted, and permanently restricted), including reclassifications between categories of net assets.

Statement of Cash Flows - Reports the cash inflows and outflows of the Organization in three categories: operating activities, investing activities, and financing activities.

Statement of Functional Expenses - Presents the expenses of the Organization in a natural or objective format and by function (i.e., which program or supporting service was served).

REFERENCED PROCEDURES

The South Carolina Association of Community Action Partnerships Finance Department's objective is to prepare accurate financial statements in accordance with generally accepted accounting principles and distribute them in a timely and cost-effective manner. In meeting responsibility, the following policies shall apply:

Monthly Distribution or As Needed

- South Carolina Association of Community Action Partnerships Board of Trustees
- Board of Trustees Governance Council
- Policy Council
- Executive Director
- Deputy Director
- All Program Directors

Quarterly Reports

- Form 425 "Financial Status Report" - Prepared and submitted to Policy Management Systems (PMS)
- Other reports as required by legislative mandates.

Semi-Annual Reports

- Form 425 "Financial Status Report" - Prepared and submitted to Administration for Children & Families, Office of Head Start, Region IV. Report is submitted within 30 days after the end of the first six months of the fiscal year. Another report is due after the end of the fiscal year within 30 days.

Annual Reports

- Final Form 425 "Financial Status Report" - Prepare and submitted to Administration for Children & Families, Office of Head Start, Region IV. The final report is submitted no later than 90 days after the end of the fiscal year.
- Audit - A copy of an audit will be presented to the South Carolina Association of Community Action Partnerships Governance Council annually by the auditor preparing the audit.
- Form 990 -Annual information return of tax-exempt organizations, filed with IRS. Form 990 is due on the fifteenth day of the fifth month following year-end. An automatic 3-month extension of time to file Form 990 may be obtained filing Form **8868**. Upon expiration of the first 3-month extension, a second 3-month extension may be requested using Form 8868. This form must be filed electronically. This form will be presented to the South Carolina Association of Community Action Partnerships Governance Council upon completion.
- Other reports as required by legislative mandates.

Other Required Reports

- P Card Statements for EHS-CCP will be sent to the appropriate governing council each month showing EHS-CCP expenditures.

Procedure Title:	Administrative Cost		
Procedure Number:	17.8	Effective Date:	November 4, 2016
Sub Procedures	N/A		
Policy Title Reference:	17.8-Administrative Cost		
Regulation References:			
Forms:	III II		
SCACAP Executive Director Approval Date:	November 4, 2016	EHS Director Approval Date:	November 4, 2016
Revisions Dates:			

POLICY

Development and Administrative Costs are limited by standard 1301.32 to 15% of the entire Early Head Start grant and non-federal share total. The remaining percentage consists of program costs, sometimes referred to as operating costs.

DEFINITIONS

15% Administrative Costs:

To calculate the Administrative Costs, add the federal amount of the grant and the non-federal amount together and take 15% percent of the total. The Early Head Start Program's Administrative Costs cannot exceed this amount.

REFERENCED PROCEDURES

The following examples may be used to assist in determining classification of costs:

Development and Administration Costs:

- Relate to the overall management of the organization or program
- Do not directly relate to the provision of program services
- Examples of development and administrative functions:
 - ▶ Planning
 - ▶ Coordination
 - ▶ Direction
 - ▶ Budgeting, accounting, auditing
 - ▶ Management of purchasing, property, payroll, personnel

Examples of development and administration wages:

- ▶ Early Head Director (100% of wages are being charged to grant)

Examples of development and administration costs, to the extent they support development and administrative functions and activities, are:

- ▶ Insurance (Administrative Offices Only)
- ▶ Supplies (Administrative Staff Only)
- ▶ Copy Machines (Administrative Staff Only)
- ▶ Postage (Administrative Staff Only)

- ▶ Utilities (Administrative Staff Only)
- ▶ Rent (Administrative Staff Only)

Program costs include, but are not limited to:

- Costs directly related to the provision of program component services and component training and transportation for staff, parents, and volunteers
- Costs of functions directly associated with the delivery of program component services through the direction, coordination or implementation of a specific component
- Costs associated with parent involvement

Examples of program wages:

- **Coordinator:**

- ▶ Education
- ▶ Mental Health/Disabilities
- ▶ Nutrition
- ▶ Family Services
- ▶ Volunteers

- **Examples of program costs, to the extent they support program functions and activities:**

- ▶ Insurance
- ▶ Supplies
- ▶ Copy machines
- ▶ Postage
- ▶ Utilities
- ▶ Rental
- ▶ Playground Supplies & Equipment
- ▶ Repairs to Centers

Dual Benefit Costs:

Some cost benefits have program components as well as development and administrative functions within the Head Start Program. In such cases, the grantee will identify and allocate appropriately the portion of the costs that are for the development and administration.

- **Space costs and costs related to space, such as utilities**
Costs will be allocated based on square footage of space utilized by staff.
- **Telephone and Internet costs**
Costs will be allocated based on the direct costs of the items used by Administrative Staff and Program Staff.
- **Office supplies, copying, postage-mailings**
Office supplies will be based on the cost of items used by Administrative Staff and Program Staff.
- **Other**
Costs will be allocated based on an appropriate cost base depending on the times being allocated.

Procedure Title:	Non-Federal Resources (In-Kind)		
Procedure Number:	17.9	Effective Date:	October 1, 2018
Sub Procedures			
Policy Title Reference:	17.9- Non-Federal Resources (In-Kind)		
Regulation References:			
Forms,			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

Federal financial assistance granted under the Head Start Act will not exceed 80 percent of the total costs of the program. Twenty percent of the total program costs will be acquired from non-federal sources. SCACAP Early Head Start Program values contributed services and property that are to be used to meet a cost sharing or matching requirement at their fair market values at the time of contribution; unless award documents or federal organization regulations identify specific values to be used.

DEFINITIONS

Non-Federal Share is the matching portion of funds the grantee must receive in order to meet the requirements of the grant.

SCACAP Early Head Start Program shall claim contributions as meeting a cost sharing or matching requirement of a federal award only if all of the following criteria are met:

- They are verifiable from SCACAP Early Head Start records.
- They are not included as contributions (or match) for any other federally-assisted project or program.
- They are necessary and reasonable for proper and efficient accomplishment of project or program objectives.
- They are allowable under the federal cost principles, 2 CFR Part 200 Subpart E, Cost Principles.
- They are not paid by the federal government under another award, except where authorized by federal statute to be used for cost sharing or matching.
- They are provided for in the approved budget when required by the federal awarding organization.
- They conform to all provisions of federal administrative regulations, 2 CFR Part 200 Subpart D, Post Federal Awards Requirements.
- In the case of donated space, (or donated use of space), the space is subject to an independent appraisal performed by a certified appraiser as defined by 2 CFR Part 200.306(i)(l) to establish its value. (According to 2 CFR Part 200.306(i)(l) "an independent appraiser is a certified real property appraiser or General Services Administrative representative". A Real Estate agent does not qualify.)

PROCEDURE

In-Kind typically falls into one of the following categories:

- Cash
- Space, buildings, land, and equipment
- Volunteer time and services
- Supplies

SUB - PROCEDURE

The following discusses the valuation and accounting treatment for each category:

CASH

- SCACAP Early Head Start Program shall recognize cash contributions as in-kind income in the period in which they are spent on allowable program costs.
- Any discounts received on goods or services are recognized as in-kind only if such discounts are not available to the general public. Discounts taken as in-kind must be supported by a letter from the vendor stating that it is providing this discount in support of the program.

SPACE, BUILDINGS, LAND, AND EQUIPMENT

BUILDINGS & LAND

- If the purpose of the contribution is to assist the SCACAP Early Head Start Program in the acquisition of equipment, building, or land, the total value of the donated property may be claimed as matching with prior approval of the awarding organization.
- If the purpose of the donation is to support activities that require the use of equipment, buildings, or land, depreciation may be claimed as matching, unless the awarding organization has approved using the full value as much.
- Equipment, land, or buildings are valued at their fair market value as determined by an independent appraiser. Information on the date of donation and records from the Appraisal will be maintained in SCACAP State Office.

SPACE

- Will be valued at the fair rental value of comparable space as established by an independent appraisal of comparable space and facilities in a privately-owned building in the same locality.
- Information on the date of donation and records from the appraisal will be maintained in a property file.
- If less than an arms-length transaction will be valued based in actual allowable costs to occupy the facility (**e.g.** repairs and maintenance, insurance, etc.) not to exceed fair market value.

VOLUNTEER TIME AND SERVICES

- Volunteer services furnished by professional and technical personnel, consultants, and other skilled and unskilled labor will be included as in-kind if the services are an integral and necessary part of the program.
- Examples of contributed services received and recorded as income and expense by SCACAP EHS-CCP Program include: (repairs, doctors, dentists, training, parents time, etc).
- Volunteer services will be valued at rates consistent with those paid for similar work in the organization. For skills not found in the organization, rates will be consistent with those paid for similar work in the labor market. Rates should include gross hourly wages plus fringe benefits calculated based on fringe benefits received by employees in similar positions, or on organization average.
- Volunteers must possess qualifications and perform work requiring those skills in order to be valued at greater than unskilled labor rate.

All volunteers are required to document and account for their contributed time using approved forms (such as: In-Kind Form (A) or **(B)**). Each partnership will provide the volunteers a form which collects the following information:

- Date service was performed
- Volunteer name and address
- **Service** provided
- Signature of Volunteer
- Signature of Center Director/ Designee

- Other

The In-Kind Forms will be delivered to the following address monthly:

SCACAP EHS-CCP Program
Early Head Start Fiscal Manager
1300 Sumter
Columbia, SC 29201

Supplies

Donated supplies must be used in the program and shall be valued at fair market value at the time of donation. Supplies can be counted as match only if the program would have purchased items with federal funds. A SCACAP Early Head Start Program In-Kind Contribution Receipt Voucher Form (D) must be filled out and submitted to the Early Head Start Fiscal Manager to be claimed as in-kind.

Procedure Title:	Single Audit		
Procedure Number	17.10	Effective Date:	November 4, 2018
Sub Procedures	N/A		
Policy Title Reference:	17.10 - Single Audit		
Regulation References:			
Forms-:			
SCACAP Executive Director Approval Date:	November 4, 2018	EHS Director Approval Date:	November 4, 2018
Revisions Dates:			

POLICY

A considerable amount of what is contained in this subpart is derived from provisions of the Single Audit Act of 1984 (as amended). Congress instructed that OMB was authorized to issue policies, procedures and guidelines to implement the Act.

When Congress amended the Single Audit in 1996, it was to delegate to OMB the authority to consider and make adjustments in the threshold amount of federal award expenditures that would trigger the requirement to have a single audit performed. OMB has raised the threshold amount of federal award expenditures that would trigger the requirement to have a single audit performed to \$750,000.

Part 2 CFR Part 200.508 states that grantee will secure the services of an independent auditor. SCACAP will adhere to the current single audit requirement for federal award expenditures.

DEFINITIONS

Single audits are required to be accomplished in accordance with the Generally Accepted Government Auditing Standards. These are issued by the Government Accountability Office and often referred to as Government Auditing Standards, GAGAS or the Yellow Book (www.gao.gov/yellowbook).

REFERENCED PROCEDURES

Auditee Responsibilities are as follows:

- (a) Procure or otherwise arrange for the audit required by this Part in accordance with § 200.509 Auditor selection, and ensure it is properly performed and submitted when due in accordance with § 200.512 Report submission. This would also include being compliant with state and local statutes.
- (b) Prepare appropriate financial statements, including the schedule of expenditures of Federal awards in accordance with § 200.510 Financial statements, **GAPP** and other requirements.
- (c) Promptly follow up and take corrective action on audit findings, including preparation of a summary schedule of prior audit findings and a corrective action plan in accordance with § 200.511 Audit findings follow-up, paragraph (b) and § 200.511 Audit findings follow-up, paragraph (c), respectively.
- (d) Provide the auditor with access to personnel, accounts, books, records, supporting documentation, and other information as needed for the auditor to perform the audit required by this Part."

Role of the Independent Auditor

The State of South Carolina will arrange for an annual audit of the Organization's financial statements to be conducted by an independent accounting firm. The independent accounting firm will be selected by the State of South Carolina through the Procurement Process.

Audited financial statements, including the auditor's opinion thereon, will be submitted and presented to the Board of Trustees by the independent accounting firm at the Board Meeting.

How to Select and to Review the Selection of the Auditor

The State of South Carolina will follow the state procurement process in reviewing the selection of the auditor.

Preparation for the Annual Audit

SCACAP shall be actively involved in planning for and assisting with the Organization's independent accounting firm in order to ensure a smooth and timely audit of its financial statements. In that regard, the Finance Department shall provide assistance to the independent auditors in the following areas:

Planning -The Chief Finance Officer/Chief Operating Officer (CFO/COO) is responsible for delegating the assignments and responsibilities to accounting staff in preparation for the audit. The Finance and Audit Director shall take primary responsibility to ensure that all requirements are met in preparing for the audit, communications and meeting the needs of the auditors during the audit, and assisting with review and announcing the results.

Involvement- Organization staff will do as much work as possible in order to assist the auditors and, therefore, reduce the cost of the audit.

Interim Procedures - To facilitate the timely completion of the annual audit, the independent auditors may perform selected audit procedures prior to the Organization's year-end. By performing significant portions of audit work as of an interim date, the work required subsequent to year-end is reduced. Organization staff will provide requested schedules and documents to assist the auditors during any interim audit fieldwork.

Throughout the audit process, SC First Steps staff will make every effort to provide schedules, documents, and information requested by the auditors in a timely manner.

Concluding the Audit

Upon receipt of a draft of the audited financial statements of SCACAP from its independent auditor, the Finance and Audit Director shall perform a detailed review of the draft, consisting of the following procedures:

- Carefully read the entire report for typographical errors.
- Trace and agree each number in the financial statements and accompanying footnotes to the accounting records and/or internal financial statements of SCACAP.
- Review each footnote for accuracy and completeness.

Any questions or errors noted as part of this review shall be communicated to the independent auditor in a timely manner and resolved to the satisfaction of the Finance and Audit Director.

It shall also be his/her responsibility, in conjunction with the CFO/COO to review and respond in writing to all management letters or other internal control and compliance report findings and recommendations made by the independent auditor.

In addition, the Single Audit Clearinghouse form shall be completed.

Audit Adjustments

It is the policy of SCACAP to review all adjustments prepared by the independent auditor in connection with the annual audit, and, if in concurrence, record them in the general ledger.

The Organization may also receive a list of unadjusted differences (or passed audit adjustments) from the independent auditor in connection with the audit. If the Organization receives such a list, it shall be the responsibility of the Director of Finance and Audit, in conjunction with the COO/CFO, to review them and determine whether or not to record them in the current year.

Internal Control Deficiencies Noted During the Audit

In accordance with generally accepted auditing standards, at the conclusion of the audit the Organization's independent auditors may provide a written communication of internal control deficiencies noted in connection with their audit. Not all deficiencies in internal control are required to be reported by the auditor. Only the following two types of deficiencies are required to be communicated:

Material weakness -A material weakness is a deficiency, or combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis.

Significant deficiency-A significant deficiency is a deficiency, or combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

The Organization's independent auditors are required to provide written communication to the Board of Trustees of all significant deficiencies and material weaknesses (i.e., only those control deficiencies that rise to the level of materiality at which they qualify under the definitions provided above, in the opinion of the auditor).

It is the Organization's policy that all internal control deficiencies that are communicated by the auditor in writing shall be formally addressed by the Board of Trustees, the Executive Director, and the CFO/COO. The Executive Director and the Chief Finance Officer/Chief Operating Officer shall prepare a written response, which shall include a corrective action plan, to each internal control finding and such response shall be presented to the Finance Committee for its review and approval.

Auditors Presentation to Board of Commissioners

In accordance with generally accepted auditing standards, in connection with and at the conclusion of each annual audit, the auditors are required to make certain communications directly to the Trustees. The independent audit will meet with the full Board of Trustees at a bi-monthly meeting.

Procedure Title:	Oversight & Approval of Financial Management, Accounting, Reporting and Compliance		
Procedure Number	17.11	Effective Date:	November 4, 2018
Sub Procedures	N/A		
Policy Title Reference:	17.11- Oversight & Approval of Financial Management, Accounting, Reporting and Compliance		
Regulation References;			
Forms,			
SCACAP Executive Director Approval Date:	November 4, 2018	EHS Director Approval Date:	November 4, 2018
Revisions Dates:			

POLICY

It is the policy of SCACAP that the appropriate governing authority shall approve financial management, accounting, and reporting policies as necessary by state and federal statutes, regulations and other requirements. The authority shall ensure compliance with laws and regulations related to financial statements. The authority will provide approval of all major financial expenditures of the agency, annual operating budget, SCACAPs Financial Policies and Procedures, audit, and financial reports to be filed by federal and state laws and regulations, including IRS Form 990 as appropriate for the funding source and the organizations structure.

DEFINITIONS

SCACAP: South Carolina
Association of Community Action
Partnerships IRS: Internal
Revenue Service

PROCEDURES

Financial Policies and Procedures Manual

1. The Chief Financial Officer and staff shall develop and document financial policies and procedures for the Agency as needed. The policies and procedures will be based on current laws and regulations, incorporate effective internal controls and strive for efficient operations.
2. The Chief Financial Officer will distribute the policies and procedures, as required and appropriate, to governing authorities. This may include the South Carolina Board of Trustees and the SCACAP to School Readiness Early Head Start Governance Council for its review, as required and appropriate, and then meet with the board or committee to discuss any questions and concerns.
3. The SCACAP to School Readiness Early Head Start Governance Council and the Chief Financial Officer will meet with the Governing Board of Trustees, as required and appropriate, to present the policies and procedures and request approval.
4. Updates to the policies and procedures will be compiled and presented annually, as needed, to any appropriate governing authority. This may include the SCACAP to School Readiness Early Head Start Governance Council and then to the full Governing Board of Trustees for review and approval, as required and appropriate.

Major Financial Expenditures

1. SCACAP is required to meet all of the State of SC Procurement Code Statutes and Regulations as well as any

federal regulations or statutes depending on the fund source.

2. The Chief Financial Officer will review and amend as needed SCACAP internal procurement policies and procedures to ensure that they include the process of obtaining appropriate governing authorities' approval as required and appropriate for any of the fund sources for the organization.
3. If needed, according to the funding source, procurement requests will be presented to the EHS-CCP Governing Board of Trustees for approval as the last step in the approval process.
 - a. The Board will consider the following:
 1. Is the item necessary for the program, and an allowable under the federal cost principles?
 2. Was the item in the budget?
 3. Does SCACAP have the resources to fund the purchase?
 4. Has SCACAP followed its procurement policies and procedures?

Annual Operating Budget

1. The annual operating budget is an agency-wide budget that includes all programs and administrative functions, and is based on the fiscal year of S C SCACAP along with the various fiscal periods for specific grants and contracts. The budget includes funds from a number of sources with varying processes for budget development. These include the State Budget and associated requests, BabyNet federal funds, EHS-CCP federal funds, and others.
2. The Chief Financial Officer will oversee preparation of the annual operating budget as follows:
 - a. State Funds: The budget process starts with the Governor submitting a request and guidance for agencies to develop their respective requests. The CFO, in conjunction with the Senior Management Team and staff, along with input from the Board of Trustees, will develop a budget request for submission to the governor. In addition, the Senior Management Team will work to monitor and support the request throughout the legislative budget process.
 - b. Federal Funds: Each federal fund will have established dates for submission for both the establishment of a federal grant, as well as the renewal for those agreements. SCACAP budget staff, senior management staff and program managers and staff will develop a plan for each of the federal budgets to ensure that all time frames and requirements for each federal grant are met. This will include involving any governance oversight at an appropriate level, including any required approvals, based on the requirements of the specific grant.

Compliance with Laws and Regulations related to Financial Statements

1. The Chief Financial Officer and staff will develop a schedule of all required financial-related reports and filing deadlines.
2. The Chief Financial Officer will provide Governing Board of Trustees' members with copies of reports as required by § 642(d)(2) of the Head Start Act and other reports as requested.
3. The SCACAP Board of Trustees will review IRS Form 990, Return of Organization Exempt from Income Tax, prior to its filing. The preparer of the return will meet with the SCACAP Board of Trustees to walk through the return and answer any questions as appropriate.

Procedure Title:	Cost of Living Adjustment		
Procedure Number:	17.12	Effective Date:	November 4, 2018
Sub Procedures	N/A		
Policy Title Reference:	17.12- Cost of Living Adjustment		
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	November 4, 2018	EHS Director Approval Date:	November 4, 2018
Revisions Dates:			

POLICY

Cost of Living Adjustments and their respective amounts will be given to all employees as determined by the South Carolina General Assembly and approved by the Senior Management Team for SCACAP.

DEFINITIONS

N/A

PROCEDURES

It is the intention of SCACAP that all eligible employees of the organization will receive the Cost of Living Adjustment regardless of which program employs the employee. The Cost of Living adjustment will become effective on the dates and for the amounts that are specified by the SC General Assembly. SCACAP will evaluate the cost of living adjustments and appropriate decisions for affected staff members with the intention of providing the benefit for all identified employees in the organization that are eligible.

If any federal grant operated under South Carolina Association of Community Action Partnerships grants a Cost of Living Adjustment, this adjustment will be awarded to the federal grant in conjunction with the cost of living adjustment at the same rates as that given by the South Carolina General Assembly. SCACAP will use appropriate tools to evaluate and adjust salaries of staff as deemed necessary. This will include the Wage and Comparability Study as specified in the EHS CCP Federal Grant.

Any federal funds awarded to cover this cost will be expended for the time period identified in the appropriate Notice of Grant Award, while keeping in compliance with the federal and state requirements.

Procedure Title:	Indirect Cost		
Procedure Number:	17.13	Effective Date:	November 4, 2018
Sub Procedures	N/A		
Policy Title Reference:	17.13 - Indirect Cost		
Regulation References:			
Forms:	III		
SCACAP Executive Director Approval Date:	November 4, 2018	EHS Director Approval Date:	November 4, 2018
Revisions Dates:			

POLICY

South Carolina Association of Community Action Partnerships is an organization whose funding resides within the South Carolina Department of Education. The SC Department of Education has a 3% Indirect Cost Rate.

PROCEDURES

An Indirect Cost **Rate** of 3% is applied to all funds with specific exceptions according to their federally approved process. This rate may be adjusted annually if a new rate is received South Carolina Department of Education.

Procedure Title :	Identifying High-Risk Concerns		
Procedure Number	17.14	Effective Date:	October 1, 2018
Sub Procedures	N/A		
Policy Title Reference:	17.14- Identifying High-Risk Concerns		
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date:	October 1, 2018	EHS Director Approval Date:	October 1, 2018
Revisions Dates:			

POLICY

The governing board of Trustees and Policy Council are responsible for oversight of the Early Head Start agency policies, procedures and actions to ensure they are in compliance with Head Start laws and regulations as well as the laws and rules of the EHS funding sources. Failure to follow the rules may result in paying back funds, or, ultimately, defunding. Therefore, the Governing Board of Trustees and Policy Council must be aware of sensitive, or "red flag), issues or situations that are particularly risky.

SOME AREAS OF HIGH RISK (this list is not comprehensive of all risks)

ISSUE	DESCRIPTION	RISK
Highly compensated Head Start Staff	The amended Head Start Act prohibits the use of <i>any</i> federal funds for compensation purposes if the employee pay rate exceeds the rate payable for level 11 of the Executive Schedule under section 5313 of title 5, United States Code. As of January 2008, that amount was \$172,200 Compensation includes salary, bonuses, periodic payments, severance pay, the value of any vacation time, the value of a compensatory or paid leave benefit, not including health, medical, life insurance, disability, retirement, or other employee welfare or pension benefit	Repay all Federal funds if over limit, or if not corrected, loss of Head Start funding
Davis-Bacon Act	<ul style="list-style-type: none"> Requires that any contractor hired to construct, renovate or repair a Head Start facility (if the contract exceeds \$2,000) must pay the laborers and mechanics engaged in the construction, renovation or repair "prevailing rate" wages. Grantees and delegate agencies will find guidance about the act in this attachment to ACYF-IM-HS-95-04. The Head Start Act applies Davis-Bacon to "the construction or renovation of facilities to be used to carry out Head Start programs" and does not make federal funding a condition of Davis-Bacon applicability. 	Repayment of Federal funds expended for less than the prevailing wage, or if not corrected, loss of Head Start funding
ISSUE	DESCRIPTION	RISK

<p>Choosing a Head Start Classroom</p>	<ul style="list-style-type: none"> • The center is subject to state licensing requirements for childcare facilities. • The designer, architect, engineer, and user must review these requirements during the initial phases of design to avoid redesign. • When the requirements of the Head Start Program Performance Standards and state and local requirements differ, the standards deemed more restrictive shall apply. 	<ul style="list-style-type: none"> • Repayment of Federal funds expended for unallowable classrooms • Penalties from state licensing agencies may also apply
<p>Acquisition of Real Property</p>	<ul style="list-style-type: none"> • Facilities acquired with ACF grant funds, in full or in part, must be used for the purposes consistent with the grant award and in the manner for which it was awarded. The facility must be used for the purpose originally authorized as long as it is needed for that purpose. Prior approval must be obtained from ACF to use the property for any other purpose. • Facilities acquired with ACF grant funds may not be transferred, assigned, mortgaged, used as collateral, leased, or in any manner encumbered by the grantee unless specifically authorized in writing by ACF. • Grant awards authorizing the purchase of facilities also require grantees to record a Notice of Federal Interest in the facility in the appropriate local government records. 	<p>Repayment of Federal funds expended for acquisition of land and buildings</p>
<p>Interest Expense</p>	<ul style="list-style-type: none"> • Costs incurred for interest on borrowed capital, temporary use of endowment funds, or the use of the organization's own funds, however represented, are unallowable. • There are exceptions for interest incurred on debt incurred to purchase or replace capital assets. See 45 C.F.R. § 230, Cost Principles for Non-Profit Organizations, Attachment 8.23 	<p>Repayment of Federal funds expended for unallowed interest or</p>
<p>ISSUE</p>	<p>DESCRIPTION</p>	<p>RISK</p>
<p>Allowability of Costs</p>	<ul style="list-style-type: none"> • The ACF Regional Office performs a cost analysis on each application received for federal funds. The purpose of a cost analysis is to determine whether the costs proposed for a program are necessary, reasonable, allocable to the program, and allowable based on the applicable federal cost principles and program regulations. • A cost is allowable if it is (a) reasonable; (b) allocable to the project for which the grant is awarded; (c) necessary for proper and efficient administration of the proposed project; (d) consistently treated as a direct or indirect cost; (e) permitted under the appropriate cost principles prescribed in 45 CFR 200.4043,404,405; (f) not restricted or prohibited by the terms and conditions of the grant; and (g) in accordance with generally accepted accounting principles (GAAP). 	<p>Repayment of Federal funds improperly expended, or If not corrected, loss of Head Start funding</p>

Cash Management	<ul style="list-style-type: none"> Federal funds advanced to the recipient should be fully disbursed (checks written, signed, and issued to the payees) by the close of business, the next work day after receipt of the funds. The recipient is responsible for determining when the Federal funds have been deposited into its bank account for each drawdown, ensuring that the funds are fully disbursed by the close of business the next work day after they are received. 	Repayment of excess Federal funds, or if not corrected, loss of Head Start funding
ISSUE	DESCRIPTION	RISK
Cost Allocation	<ul style="list-style-type: none"> A cost is allocable to a federal award if it is treated consistently with other costs incurred for the same purpose in like circumstances, and if it: <ul style="list-style-type: none"> Is incurred specifically for the award; Benefits both the award and other work of the organization and can be distributed in reasonable proportion to the benefits received; or Is necessary to the overall operation of the organization, although a direct relationship to any particular grant cannot be shown. Refer to the federal cost principles. <ul style="list-style-type: none"> 45 C.F.R. § 220, Cost Principles for Educational Institutions 45 C.F.R. § 225, Cost Principles for State, Local and Indian Tribal Governments 45 C.F.R. § 230, Cost Principles for Non-Profit Organizations 	Repayment of Federal funds expended that were improperly allocated, or if not corrected, loss of Head Start funding
In-Kind	<ul style="list-style-type: none"> Head Start programs are required to use third-party in-kind contributions equaling in value at least 20% of total funding (or 25% of the Federal funding.) <ul style="list-style-type: none"> For every \$1 you spend of Federal funds, you must have \$.25 non-federal match. Two Main Issues for all Head Start In-Kind <ul style="list-style-type: none"> There must be a clear benefit to an approved Head Start Activity How is the in-kind valued 	<ul style="list-style-type: none"> Repayment of Federal funds expended, that were not properly matched Reduction in future Head Start funding, if unable to provide sufficient non-Federal share Inability to qualify for expansion or one-time funding
ISSUE	DESCRIPTION	RISK
Employee, Board and volunteer	<ul style="list-style-type: none"> Be sure any travel taken on behalf of your organization can be justified <ul style="list-style-type: none"> Would you be comfortable defending it on the 6:00 news? 	<ul style="list-style-type: none"> Repayment of Federal funds expended if costs were not allowable

travel expenditures	<ul style="list-style-type: none"> • Prior approval is required for: <ul style="list-style-type: none"> • Program participants' travel costs • Foreign travel 	<ul style="list-style-type: none"> • Repayment of Federal funds if prior approval not received when required
15% Administrative Cost Limit	<ul style="list-style-type: none"> • The costs of developing and administering a Head Start program cannot exceed 15% percent of the total costs, including the required nonfederal contributions (in-kind). • Each program must maintain, and annually submit to the Secretary, a complete accounting of the recipient's administrative expenses • The limit of 15% for development and administrative costs is a maximum. 	Repayment of Federal funds expended in excess of 15% limit, or if not corrected, loss of Head Start funding
Under-enrollment	<ul style="list-style-type: none"> • Head Start Agencies are required to maintain enrollment levels established by their grants (funded enrollment). 	Repayment of federal funds and/or reduction of grant in future years.

PROCEDURES

The Governing Board of Trustees and the Policy Council will ensure the agency's systems and processes allow management to recognize, minimize and manage risks.

Agency management, Executive Director, Early head Start director, Finance Manager, and Human Resources Director, etc., is responsible for developing and carrying out policies and procedures that protect the agency.

Review the annual self-assessment and updates, community assessments, results of internal monitoring, results of on-site monitoring, results of audits to determine hot spots for high risk areas.

The above can be completed by using experts on the Governing Board of Trustees to provide guidance in their respective areas of legal, fiscal, and early childhood.

Procedure Title	Budget Development and Revisions		
Procedure Number:	17.15	Effective Date:	November 4, 2018
Sub Procedures	N/A		
Policy Title Reference:	17.15- Budget Development and Revisions		
Regulation References:			
Forms:			
SCACAP Executive Director Approval Date ,	November 4, 2018	EHS Director Approval Date:	November 4, 2018
Revisions Dates:			

POLICY

Budgeting is an integral part of managing any organization in that is concerned with the translation of organization goals and objectives into financial terms. A budget should be designed and prepared to direct the most efficient and prudent use of the organization's financial and human resources.

Budgets are prepared for funding sources, and each Program Director must be aware of budget modification requirements. Awarding agencies may or may not require approval for changes in line items. South Carolina Association of Community Action Partnerships will document and follow all such requirements.

PROCEDURES

Once data is received from the funding source on the amount of funds to be received, as required, the following steps will be followed:

- Meeting is scheduled with Program Director to discuss needs for the next funding cycle
- Program Director seeks input on the budget needs for the next period. This would include staff, Policy Council and the EHS Governance Council.
- Once the SCACAP Finance staff will receive all pertinent information for the budget, a budget is developed by reviewing data from previous cycle, information from both councils, and program director.
- SCACAP CFO/COO will review and approve the budget.
- SCACAP Senior Leadership will review and approve the budget.
- The budget is sent to Board of Trustees and Policy Council (if required) for their approval.
- If budget revisions or amendments need to be made, the steps above will be followed.

BUDGET AND PROGRAM REVISIONS

- Change in the scope or the objective of the project (even if there is no associated budget revision required prior written approval)
- Change of more than 25% or \$250,000 in any specific year for the grant expenses or categories.
- Change in key person (Program Director, etc.) specified in the application or award document.
- Disengagement for more than three months, or a 25 percent reduction in time devoted to the project, by the approved Program Director or principal investigator.
- The need for additional Federal funding
- The inclusion, unless waived by the awarding agency, of costs that require prior approval in accordance with Subpart E-Cost Principles or 2 CFR Part 200.407, prior written approval.
- The transfer of funds allotted for participant support costs as defined in 200.75 Participant support costs to other categories of expense.

- Unless described in the application and funded in the approved award, the sub-award, transfer of contracting out of any work under an award. (However, this provision does not apply to the purchase of supplies, material, equipment or general support services.)
- Changes in the amount of the approved cost-sharing or matching provided by the Organizations.