

1.0 Program Governance Table of Contents

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SOUTH CAROLINA FIRST STEPS PROCEDURE

Procedure Title:	Governance		
Procedure Number:	1.1	Effective Date:	August 18, 2016
Policy Title Reference:	Governance		
Regulation References:	CFR45 1301.1, 1301.2, 1301.3		
Forms:			
SCFS Executive Director Approval Date:	August 18, 2016	EHS Director Approval Date:	August 18, 2016
Revisions Dates:			

POLICY

SC First Steps' Early Head Start-Child Care Partnership Program (SCFS EHS-CCP) will maintain a shared governance structure through which parents will participate alongside program staff, community members and the South Carolina First Steps Board of Trustees (BOT, in its capacity as the grantee Governing Board) in policymaking and in other program decisions. South Carolina First Steps to School Readiness (hereafter "First Steps"), 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 First Steps Board of Trustees (via its designated Early Head Start Governance Council) and the Policy Council.

DEFINITIONS

SCFS: South Carolina First Steps

SCFS EHS-CCP: South Carolina First Steps Early Head Start Child Care Partnership

BOT: South Carolina First Steps Board of Trustees

PROCEDURES

Parents of enrolled children will be offered the opportunity to participate in the Early Head Start governance and decision-making process through participation in a Policy Council at the grantee level, and through participation in Parent Committees at the child care 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 SC First Steps Board of Trustees/Early Head Start Governance Council and the Policy Council will share decision-making responsibility for the SC First Steps 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 SC First Steps Board of Trustees 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 SC First Steps Board of Trustees 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 SC First Steps Early Head Start Internal Dispute Resolution Policy 1.5.

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SOUTH CAROLINA FIRST STEPS PROCEDURE

Procedure Title:	Grantee Agency		
Procedure Number:	1.2	Effective Date:	August 18, 2016
Policy Title Reference:	1.2 – Grantee Agency		
Regulation References:	45CFR1301.2(b)		
Forms:			
SCFS Executive Director Approval Date:	August 18, 2016	EHS Director Approval Date:	August 18, 2016
Revisions Dates:			

POLICY

The SC First Steps to School Readiness Board of Trustees (BOT) is the statutorily-authorized governing board of the grantee agency. This Board is composed of 25 ex-officio and appointed members designated by the Governor, the Speaker of the SC House of Representatives and the President Pro Tempore of the Senate. All oversight responsibilities – including the purchase of real property - will be the purview of the SC First Steps to School Readiness Board of Trustees.

The SC First Steps Board of Trustees 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 (EHS) program, South Carolina First Steps 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

BOT: South Carolina First Steps Board of Trustees
 EHS: Early Head Start

PROCEDURES

Funding Applications: The Early Head Start Director will submit funding applications to the SC First Steps Early Head Start Governance Council for approval and signature by the Council Chair. The application will then be forwarded to the SC First Steps Board of Trustees, 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: SC First Steps to School Readiness will advertise open, grantee-level positions within the Early Head Start grant. Local hiring will be conducted by contracted child care partners and/or local First Steps Partnerships with the advice and consent of SC First Steps. The Early Head Start Director will send a written hiring recommendation to the Director for approval prior to processing hiring paperwork through the SC State Department of Education.

Financial Management: SC First Steps 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 SC First Steps to School Readiness Board of Trustees/Early Head Start Governance Council and 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.

SOUTH CAROLINA FIRST STEPS PROCEDURE

Indirect Rate: The State Department of Education 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 SC First Steps Early Head Start Financial Management Work Plan and Financial Reporting Policy 17.3.

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Procedure Title:	Grantee Board		
Procedure Number:	1.3	Effective Date:	August 18, 2016
Policy Title Reference:	1.3 – Grantee Board		
Regulation References:	45CFR1301.2(a-c)		
Forms:			
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Revisions Dates:			

POLICY

South Carolina First Steps Board of Trustees (BOT), 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 responsibilities to a formally-chartered Early Head Start Governance Council (EHSGC), which will serve as a standing committee of the Board. In addition to Trustees, the EHSGC will include appointed members drawn from the local community, along with at least one parent/grandparent member of Policy Council who will serve as a liaison between the two groups. Actions of the EHSGC will be communicated to and ratified by the SC First Steps Board of Trustees, 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

SCFS: South Carolina First Steps
 EHS: Early Head Start
 BOT: SC First Steps Board of Trustees
 EHSGC: Early Head Start Governance Council

PROCEDURES

Required membership of the Board

The SC First Steps Board of Trustees shall serve as the EHS Governing Body for purposes of the grant. The membership of this Board – which meets Head Start’s exemption from federal composition guidelines by virtue of its status as a public entity overseen by a governing board whose “members oversee a public entity and are selected to their positions with the public entity by public election or political appointment” is outlined in SC Section 63-11-1720, quoted below.

SECTION 63-11-1720. Board of Trustees; composition

(A) There is created the South Carolina First Steps to School Readiness Board of Trustees which must be chaired by the Governor, or his designee, and must include the State Superintendent of Education, or his designee, who shall serve as ex officio voting members of the board.

(B) In making the appointments specified in subsection (C)(1), (2), and (3) of this section, the Governor, President Pro Tempore of the Senate, and the Speaker of the House of Representatives shall seek to ensure diverse geographical representation on the board by appointing individuals from each congressional district as possible.

SOUTH CAROLINA FIRST STEPS PROCEDURE

(C) The board shall include members appointed in the following manner:

(1) the Governor shall appoint one member from each of the following sectors:

(a) parents of young children;

(b) business community;

(c) early childhood educators;

(d) medical providers;

(e) child care and development providers; and

(f) the General Assembly, one member from the Senate and one member from the House of Representatives;

(2) the President Pro Tempore of the Senate shall appoint one member from each of the following sectors:

(a) parents of young children;

(b) business community;

(c) early childhood educators; and

(d) medical or child care and development providers;

(3) the Speaker of the House of Representatives shall appoint one member from each of the following sectors:

(a) parents of young children;

(b) business community;

(c) early childhood educators; and

(d) medical or child care and development;

(4) the chairman of the Senate Education Committee or his designee;

(5) the chairman of the House Education and Public Works Committee or his designee; and

(6) the chief executive officer of each of the following shall serve as an ex officio voting member:

(a) Department of Social Services;

(b) Department of Health and Environmental Control;

(c) Department of Health and Human Services;

(d) Department of Disabilities and Special Needs;

(e) State Head Start Collaboration Officer; and

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SOUTH CAROLINA FIRST STEPS PROCEDURE

(f) Children's Trust of South Carolina.

(D) The terms of the members are for four years and until their successors are appointed and qualify. The appointments of the members from the General Assembly shall be coterminous with their terms of office.

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 Director.

The SC First Steps Board of Trustees will ensure a system for the annual performance review of the Early Head Start Director by the due date of each program year. This evaluation will be conducted by First Steps' Deputy 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 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 Early Head Start Director.

SOUTH CAROLINA FIRST STEPS PROCEDURE

Procedure Title:	Policy Council		
Procedure Number:	1.4	Effective Date:	August 18, 2016
Policy Title Reference:	1.4 – Policy Council		
Regulation References:	45CFR1301.3(b)(c)		
Forms:			
SCFS Executive Director Approval Date:	August 18, 2016	EHS Director Approval Date:	August 18, 2016
Revisions Dates:			

POLICY

South Carolina First Steps to School Readiness (SCFS) 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 SCFS, 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

SCFS: South Carolina First Steps 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 SCFS 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 records check. Fees associated with obtaining the criminal records check will be paid for by SCFS.

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.

SOUTH CAROLINA FIRST STEPS PROCEDURE

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 Grantee Board to develop, review and approve or disapprove policies. Policy Council will serve in a leadership capacity with direct links to the Parent Center Committees, First Steps' Early Head Start Governance Council and the communities they serve. Policy Council, in collaboration with the Grantee Board, 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 sit on First Steps' Early Head Start Governance Council and members of the Council will be notified of upcoming Policy Council Meetings and invited to attend. Minutes will be shared between the two groups.

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.

SOUTH CAROLINA FIRST STEPS PROCEDURE

Procedure Title:	Internal Dispute Resolution		
Procedure Number:	1.5	Effective Date:	August 18, 2016
Policy Title Reference:	1.5 – Internal Dispute Resolution		
Regulation References:	45 CFR Part(s): 1301.6(a-c)		
Forms:			
SCFS Executive Director Approval Date:	August 18, 2016	EHS Director Approval Date:	August 18, 2016
Revisions Dates:			

POLICY

The First Steps Board of Trustees (BOT), 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 BOT 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.

BOT: SC First Steps Board of Trustees

PROCEDURES

STEP ONE: The First Steps Board of Trustees 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 First Steps Board of Trustees 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 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 First Steps Board of Trustees 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 SC First Steps Early Head Start grant funds.

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SOUTH CAROLINA FIRST STEPS PROCEDURE

Procedure Title:	Community Greivance		
Procedure Number:	1.6	Effective Date:	August 18, 2016
Policy Title Reference:	1.6 – Community Greivance		
Regulation References:	45CFR1302.34(b)		
Forms:			
SCFS Executive Director Approval Date:	August 18, 2016	EHS Director Approval Date:	August 18, 2016
Revisions Dates:			

POLICY

SC First Steps 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 First Steps Board of Trustees for resolution of the problem.

DEFINITIONS

N/A

PROCEDURES

A grievance is a written statement that the laws, rules, policies, or procedures under which the Early Head Start 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 Early Head Start staff; 4) concern that Early Head Start 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 Early Head Start program did not follow approved policy.

Early Head Start 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 Early Head Start 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 Early Head Start Policy Council will contact the Chair of the SC First Steps Board of Trustees 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 Policy Council and First Steps Board of Trustees is final.

SOUTH CAROLINA FIRST STEPS PROCEDURE

Procedure Title:	Parent Committee		
Procedure Number:	1.7	Effective Date:	August 18, 2016
Policy Title Reference:	1.7 – Parent Committee		
Regulation References:	45CFR1301.4(a-b)		
Forms:			
SCFS Executive Director Approval Date:	August 18, 2016	EHS Director Approval Date:	August 18, 2016
Revisions Dates:			

POLICY

A Parent Committee will be established in each center to provide all parents of children enrolled in the Early Head Start 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 classroom will have voting privileges in a Parent Committee.

DEFINITIONS

N/A

PROCEDURES

Each Early Head Start 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 Grantee Board Meetings will be available in all centers and will be shared between the Grantee Board and Policy Council. The Policy Council Representative to the EHS Governance Council will relay center recommendations and input to the Grantee Board.

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.

SOUTH CAROLINA FIRST STEPS PROCEDURE

Procedure Title:	Reimbursement		
Procedure Number:	1.8	Effective Date:	August 18, 2016
Policy Title Reference:	1.8 –Reimbursement		
Regulation References:	45CFR1301.3(e)		
Forms:			
SCFS Executive Director Approval Date:	August 18, 2016	EHS Director Approval Date:	August 18, 2016
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

N/A

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 SC First Steps Early Head Start 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 SC First Steps Early Head Start Program. Reimbursement may be provided for the following activities: Policy Council Meetings; Policy Council Planning Committee Meetings; Self-Assessment Activities; and SC First Steps Early Head Start Program Meetings. Only one car per center will be reimbursed for each meeting, or one car for each 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 SC First Steps Early Head Start program will cover the costs of parents who attend SC First Steps Early Head Start 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 SC First Steps Early Head Start Program.