



**Interoffice Memorandum**

April 15, 2020

**AGENDA ITEM**

**TO:** Mayor Jerry L. Demings  
-AND-  
Board of County Commissioners

**THRU:** Lonnie C. Bell, Jr., Director *Lonnie C. Bell, Jr.*  
Community and Family Services Department

**FROM:** Sonya L. Hill, Manager *Sonya L. Hill*  
Head Start Division  
**Contact: Khadija Pirzadeh, (407) 836-8912**  
**Sonya Hill, (407) 836-7409**

**SUBJECT: Consent Agenda Item – May 5, 2020**  
Application for Federal Assistance related to  
Cost-of-Living Adjustment (2%) FY 2019-2020

The Head Start Division requests Board approval of the Application for Federal Assistance related to Cost-of-Living Adjustment (COLA) between the Department of Health and Human Services, Administration for Children and Families, Office of Head Start and Orange County. A portion of the cost-of-living adjustment (2%) grant funds will be used to increase staff salaries and fringe benefits.

The total COLA funds in the estimated amount of \$266,001, includes \$191,748 that will be used to offset higher operational costs of salaries. The amount of \$74,253 will be used to add a Nutrition Consultant to meet federal regulations 1302.44 as listed in the Head Start Program Performance Standards. The non-federal match of \$66,500 is generated from donations of goods and services and in-kind contributions.

The Application for Federal Assistance includes a Compendium of required Certifications and Assurances for non-construction programs: Certifications regarding Lobbying for Contracts, Grants, Loans and Cooperative Agreements; Certification regarding compliance with Compensation Cap (Level II of the Executive Schedule); Certification of Filing and Payment of Federal Taxes; and Employee Compensation Cap Compliance Assurance. The term of the grant is from October 1, 2019 through September 30, 2020. The Head Start Policy Council approved the COLA grant at their meeting on April 13, 2020.

Consent Agenda Item – May 5, 2020

Application for Federal Assistance related to Cost-of-Living Adjustment

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**ACTION REQUESTED:** Approval of Orange County Head Start Application for Federal Assistance related to Cost-of-Living Adjustment (2%) FY 2019-2020 in the estimated amount of \$266,001; and approval and execution of (1) Certification of Filing and Payment of Federal Taxes and (2) Employee Compensation Cap Compliance Assurance.

SH/kp:jam

Attachments

c: Randy Singh, Deputy County Administrator  
Cristina Berrios, Assistant County Attorney, County Attorney's Office  
John Petrelli, Director, Risk Management and Professional Standards  
Yolanda Brown, Manager, Fiscal Division, Community and Family Services  
Jamille Clemens, Grants Supervisor, Finance Division  
Nanette Melo, Assistant Manager, Office of Management and Budget  
Auria Oliver, Management and Budget Advisor, Office of Management and Budget

**ORANGE COUNTY HEAD START APPLICATION  
FOR FEDERAL ASSISTANCE  
related to  
COST-OF-LIVING ADJUSTMENT (2%) FY2019-2020**

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## **I. COLA Narrative**

Orange County, Florida, the non-federal entity, is requesting federal grant funds related to Cost-of-Living Adjustment (COLA) for the provision of Head Start Services to serve 1,536 children throughout Orange County, Florida. Orange County Head Start (OCHS) will use the permanent 2% Cost Of Living Adjustment (COLA) grant funds to pay for higher operating costs and to permanently increase staff salaries and fringe benefits.

### *Salary Supplement*

The OCHS program requests funds in the amount of \$191,748 to assist with salary increases for the FY 2019-2020 school year. The Orange County Board of County Commissioners approved a 4% cost of living salary increase for all Orange County Government employees. All OCHS staff received this salary increase as well as an increase in base salaries within the established pay grades. The COLA award of \$191,748 in federal funds will assist with supplementing salaries during the 2019-2020 school year.

OCHS Division, along with the OCHS Policy Council has determined that this will be the best allocation of the permanent COLA dollars. Due to higher salary increases and fringe costs, this request will help OCHS to permanently improve and align the pay scale of its employees' salaries and benefits with other providers offering similar services.

### *Nutrition Consultant*

OCHS is requesting \$74,253 to add a Nutrition Consultant position to the organization structure. This addition will ensure OCHS program's capacity to be

compliant with the federal regulations, Head Start Program Performance Standards (HSPPS) 1302.44 and the USDA guidelines for nutrition and health requirements. Prior to the FY 2020, The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) handled services with a qualified Nutrition Consultant. Due to WIC's own case load, only one Nutrition Consultant was assigned to implement the services stated in the referral agreement with OCHS. The only need that was met by WIC during this time was referrals to the WIC program and review of growth and dietary needs. The lack of services provided by WIC resulted in the program's non-compliance to meet the federal regulations.

Over the past year, OCHS attempted to find other agencies and businesses to supplement the caseload, but was unsuccessful. In August 2019, Florida Health Department, Women's Infants and Children decided not to renew the contract with Orange County, which resulted in unmet services to children, and caused OCHS to be non-compliant with federal performance standards. Although the program provided as many of the services stated in 1302.44, it is the desire of the governing board and policy council to exceed expectations. Staff could not conduct certain duties without proper certification.

The Nutrition Consultant will work with children and families to achieve overall nutritional wellness goals. This will be achieved by implementing nutrition services for children in the program using a nutrition screening instrument where children will be assessed to receive the nutrition counseling needed to improve outcomes.

This position will also serve to build relationships in the community. It has been proven that OCHS community partnerships provide essential services to help families

receive support in areas of need. The Nutrition Consultant will be able to coordinate essential services that will improve children's nutrition outcomes. The Nutrition Consultant will develop appropriate systems to support families who are not meeting their nutritional needs to secure consistent, healthy meals that meet the needs of both children and families.

This position will create and document referrals for children in need of the FL WIC program, and follow-up as deemed appropriate. In addition, the Nutrition Consultant will coordinate meetings and provide counseling to parents, as needed. Finally, the Nutrition Consultant will develop and present workshops to the parents of Head Start children.

## II. COLA Budget Justification

The Orange County Board of County Commissioners had approved a 4% cost of living salary increase for all Orange County Government employees. All Orange County Head Start staff received this salary increase as well as an increase in base salaries within the established pay grades. It was determined by Orange County Head Start and Policy Council that no additional increase will be provided to employees but funding would be used to help cover the increase in salaries.

The COLA award of \$191,748 in federal funds will assist with salaries in the following amounts:

Amount Allocated	Description
\$165,428	Salaries for staff in the Orange County Head Start Program
\$12,656	FICA for staff in the Orange County Head Start Program
\$13,664	Retirement cost at 8.26% for Orange County Head Start Staff

The OCHS Division, along with The OCHS Policy Council has determined that this will be the best allocation of the permanent COLA dollars. Due to the increased salary and fringe benefit costs, the requested award will help Orange County Head Start to permanently improve alignment of the pay scale of its employees in salaries and benefits with other providers of like services.

The Nutrition Consultant position will have a total salary cost \$74,253.

**Nutrition Consultant**

<b>Base Salary</b>	<b>FICA</b>	<b>Retirement</b>	<b>Insurance</b>	<b>Total</b>
\$51,982	\$3,977	\$4,294	\$14,000	\$74,253

*In-Kind Match*

The total In-Kind match for both COLA and Quality Improvement is \$168,644. OCHS will provide the requested \$66,500, for COLA non-federal share through donations of goods and services, in-kind service and services from the Board of County Commissioners.





**COMMUNITY AND FAMILY SERVICES DEPARTMENT  
HEAD START DIVISION**

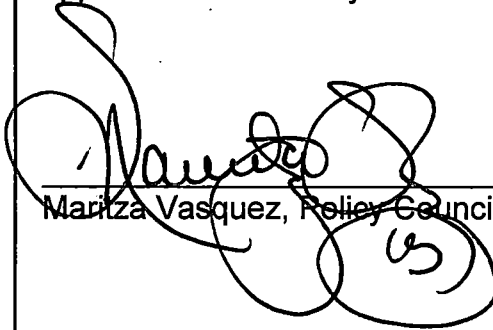
2100 East Michigan Street • Orlando, FL 32806-4914  
407-836-6590 • Fax: 407-836-8981 • <http://www.orangecountyfl.net>

April 13, 2020

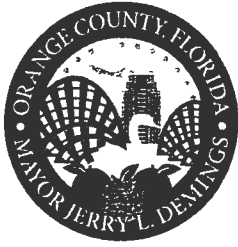
The Orange County Policy Council approved the Cost of Living Adjustment (COLA) Application FY 2019 - 2020 at its Policy Council meeting held on April 13, 2020 in anticipation of a Notice of Award letter for Head Start.

Funds in the amount of \$266,001 will be used to assist with salaries and benefits for the Head Start Program.

Special Note: Minor changes are permitted to the content and grammar of the application after Policy Council's approval.



Maritza Vasquez, Policy Council Chairperson



ORANGE COUNTY MAYOR

**Jerry L. Demings**

P.O. BOX 1393, 201 SOUTH ROSALIND AVENUE, ORLANDO, FL 32802-1393

PHONE: 407-836-7370 • FAX: 407-836-7360 • EMAIL: MAYOR@OCFL.NET

February 20, 2020

TO: Board of County Commissioners

FROM: Mayor Jerry L. Demings 

SUBJECT: Fiscal Year 2021 Budget Guidelines

The budget season is upon us once again. As we prepare the fiscal year 2021 budget, I want to build upon my commitment for meeting the needs of our growing community. The primary goal is to develop a balanced budget that provides for a high level of service to our community, and one that delivers quality services in the most efficient and cost effective manner.

I intend to evaluate all aspects of the budget and make adjustments as necessary to serve our citizens. To meet these goals, I am issuing the following budget guidelines for fiscal year 2021:

- 4.0% increase for salaries.
- New position requests will be thoroughly evaluated and considered only included if the positions are tied to meeting the growing needs of the community.
- Operating increases should be kept to a minimum. Any requested increases will need to be fully justified.
- New capital projects addressing infrastructure needs will be considered, contingent upon funding availability.

The Office of Management and Budget will be working with constitutional offices and county departments on their budgets and will be monitoring items that may have a potential to impact budget decisions, such as legislative changes or fluctuations in the overall economy. If anything occurs to necessitate amending these guidelines, I will communicate those changes as soon as possible.

/kp

c: Byron W. Brooks, AICP, County Administrator  
Deputy County Administrators  
Department Directors and Division Managers

**U.S. DEPARTMENT OF HEALTH AND HUMAN  
SERVICES COMPENDIUM OF REQUIRED  
CERTIFICATIONS AND ASSURANCES**

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**Office of Head Start**

Updated July 29, 2014

# U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES COMPENDIUM OF REQUIRED CERTIFICATIONS AND ASSURANCE

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# U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES COMPENDIUM OF REQUIRED CERTIFICATIONS AND ASSURANCE

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## SF424B Assurances – Non-Construction Programs

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

## U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES COMPENDIUM OF REQUIRED CERTIFICATIONS AND ASSURANCE

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9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

# U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES COMPENDIUM OF REQUIRED CERTIFICATIONS AND ASSURANCE

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## Certification Regarding Lobbying

### Certification for Contracts, Grants, Loans, and Cooperative Agreements

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form- LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.
3. The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

### Statement for Loan Guarantees and Loan Insurance

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

### Regarding Compliance with Compensation Cap (Level II of the Executive Schedule)

Federal funds will not be used to pay any part of the compensation of an individual employed by a Head Start and/or Early Head Start agency if that individual's compensation exceeds the rate payable for Level II of the Executive Schedule.

# U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES COMPENDIUM OF REQUIRED CERTIFICATIONS AND ASSURANCE

APPROVED BY ORANGE COUNTY BOARD OF COUNTY COMMISSIONERS

## Certification of Filing and Payment of Federal Taxes

BCC Mtg. Date: May 5, 2020

As required by the Departments of Labor, Health and Human Services, and Education and Related Agencies Appropriation Act, 2008 (Public Law 110-161, Division G, Title V, section 523), as a prospective financial assistance recipient entering into a grant or cooperative agreement of more than \$5,000,000, I, as the duly authorized representative of the applicant, do hereby certify to the best of my knowledge and belief, that:

1. The applicant has filed all Federal tax returns required during the three years preceding this certification
2. The applicant has not been convicted of a criminal offense pursuant to the Internal Revenue Code of 1986 (U.S. Code - Title 26, Internal Revenue Code)
3. The applicant has not, more than 90 days prior to this certification, been notified of any unpaid Federal tax assessment for which the liability remains unsatisfied, unless the assessment is the subject of an installment agreement or offer in compromise that has been approved by the Internal Revenue Service and is not in default, or the assessment is the subject of a non-frivolous administrative or judicial proceeding.

## Submission Statement

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

### Authorized Representative:

Prefix:  \* First Name:   
 Middle Name:   
 \* Last Name:   
 Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative:  \* Date Signed:

\* Submitted by:  Date Submitted:





BCC Mtg. Date: May 5, 2020.

### Employee Compensation Cap Compliance Assurance

Head Start funds do not pay for the salary of the Executive Director either as a direct cost or any proportion as an indirect cost, at a rate in excess of \$197,300.00. Funds are, however, used to pay for the salaries of the Head Start Director, the Fiscal Program Manager, and the Senior Program Early Childhood Education. Those salaries are as follows:

Position	Base Salary	FICA	Retirement	Health	Total
HS Manager	\$101,462	\$7,366	\$8,380	\$14,000	\$131,209
Sr. Program Mgr. Early Childhood Education	\$67,288	\$4,885	\$5,558	\$14,000	\$91,731
Program Mgr. (Fiscal)	\$59,467	\$4,317	\$4,912	\$14,000	\$82,696

### Orange County, Florida

### Employee Compensation Cap Compliance Assurance

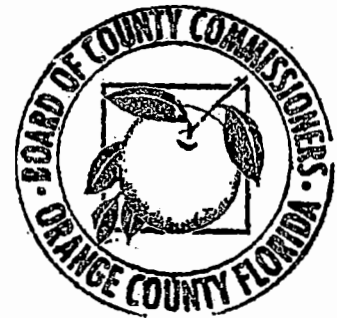
Orange County, Florida complies with the Head Start Act, Section 653 (Comparability of Wages), which limits the compensation of Head Start staff. The language precludes use of any Federal funds to pay any part of the compensation of an individual employed by a Head Start agency whose compensation exceeds the rate payable for Level II of the Executive Schedule, which is currently \$197,300. None of the Orange County, Florida staff exceed the employee compensation cap.

Signature: \_\_\_\_\_

Title: *Jerry L. Demings*  
for Jerry L. Demings, Orange County Mayor

Organization: Orange County, Florida

Date: MAY 0 5 2020





ADMINISTRATION FOR  
**CHILDREN & FAMILIES**

Office of Head Start | 330 C St., SW, 4th Floor, Washington DC 20201 | eclkc.ohs.acf.hhs.gov

March 13, 2020

**Grant No. 04CH010230**

**Dear Head Start Grantee:**

The Further Consolidated Appropriations Act, 2020, contains an increase of approximately \$550 million for programs under the Head Start Act for Fiscal Year (FY) 2020. The increase provides \$193 million for a cost-of-living adjustment (COLA) and \$250 million for Quality Improvement investments for Head Start. The COLA supports an increase of two percent for each grantee to increase staff salaries and fringe benefits, and offset higher operating costs. COLA funds are effective at the start of the FY 2020 budget period and are retroactive if this period has already begun. Quality Improvement funds are allocated proportionately based on federal funded enrollment, with additional consideration given to small grantees to allow for a meaningful investment, as permitted by the Act.

The following table reflects the COLA and Quality Improvement increases available for FY 2020.

<b>Funding Type</b>	<b>Head Start</b>
Cost-of-Living Adjustment (COLA)	\$266,001
Quality Improvement (QI)	\$408,576
<b>Total Funding</b>	<b>\$674,577</b>

The table provides projected amounts for each program, Head Start and/or Early Head Start. The Quality Improvement allocation above was calculated on Head Start and/or Early Head Start funded slots; however, grantees operating both programs have flexibility to use any amount of funding on either program, based on community needs, and not to exceed the total amount available. This flexibility does not extend to COLA allocations. Please note, allocations in the table are based on annual funding and enrollment levels by program as of February 2020, and may be subject to change if there are adjustments to these levels.

### **Submission Requirements**

The supplemental application is due **May 15, 2020** and must be submitted in the Head Start Enterprise System (HSES). To apply, please select the **Financials** tab, **Grant Application** tab, **Fiscal Year 2020**, and add the **'Supplement – COLA and Quality Improvement'** amendment type. No other application type for these funds will be accepted.

### **Content of 'Supplement – COLA and Quality Improvement' Application**

Applications must include separate narratives and detailed budget justifications for each funding type, COLA and Quality Improvement, and by program, Head Start and/or Early Head Start. Each narrative must begin with a Table of Contents, use 12 point font, and not exceed 10 pages. All narratives, budget justifications, and other supporting documentation must be uploaded into respective folders within the **Documents** tab of the application.

#### **COLA Narrative and Budget Justification**

Grantees must demonstrate:

- An increase of no less than two percent of the current pay scale for Head Start/Early Head Start employees, including unfilled vacancies, subject to the provisions of Sections 653 and 640(j) of the Head Start Act;
- The rationale and documentation detailing agency policies and procedures if employees are receiving less than the two percent COLA or differential COLA increases;
- The provision of a no less than two percent increase to all delegate agencies and partners or justification if less than two percent or differential increases are provided to delegate agencies and partners;
- The planned uses for the balance of the COLA funds to offset higher operating costs.

Sections [653](#) and [640\(j\)](#) of the Head Start Act provide further guidance on the uses and limitations of COLA funds. Sec. 653 restricts compensation to a Head Start employee that is higher than the average rate of compensation paid for substantially comparable services in the area where the program is operating. Sec. 640(j) of the Act requires compensation of Head Start employees must be improved regardless of whether the agency has the ability to improve the compensation of staff employed by the agency that do not provide Head Start services. Grantees with concerns that staff salaries cannot be increased due to wage comparability issues should ensure public school salaries for kindergarten teachers are included in their considerations.

#### Quality Improvement Narrative and Budget Justification

Grantees must demonstrate:

- Investments are consistent with Sec. 640(a)(5) of the Act (except programs are not bound by the requirements that at least 50 percent of the funds be used for staff compensation or that no more than 10 percent of funds be used on transportation. For more information on allowable activities as outlined in the Act, please see Attachment A);
- Investments made in Quality Improvement will be ongoing;
- How investments support children, families, and staff impacted by trauma; or justify the reasoning for investing in an activity not directly related to addressing trauma (For specific examples, please see Attachment B or the following resource on [Implementing a Trauma-Informed Approach](#).)
- For programs using flexibility in the proportional share of the funding for Head Start and Early Head Start, justify how that approach fully supports the greatest needs of communities.

Grantees are strongly encouraged to invest this funding into program efforts and activities that help better incorporate a trauma-informed approach that will support children, families, and staff impacted by adverse experiences. **For more information on trauma and implementation of trauma-informed approaches in Head Start and Early Head Start programs, including specific examples, please see Attachment B or the following resource on [Implementing a Trauma-Informed Approach](#).** However, grantees do have the flexibility to use these Quality Improvement funds to meet grantees' most pressing local needs, consistent with Section 640(a)(5) of the Act. With this funding, grantees should plan for ongoing, sustained investments in quality improvements, while also acknowledging one-time investments in FY 2020 year may be necessary to sustain ongoing quality improvement.

#### Budget Requirements

The data entered on the budget tab within the application populates the SF-424A. Grantees are required to include funds for both COLA and Quality Improvement, and within the appropriate program, Head Start or Early Head Start.

### Non-Federal Share

The budget and detailed budget justification must include each source of non-federal match, including estimated amount per source and the valuation methodology. A detailed justification that conforms with the criteria under Section 640(b)(1)-(5) of the Head Start Act must be submitted if the application proposes a waiver of any portion of the non-federal match requirement.

### Supporting Documents

Signed statements of the Governing Body and Policy Council Chairs along with Governing Body and Policy Council minutes documenting each group's participation in the development and approval of the supplemental application for COLA and Quality Improvement must be provided.

The application must be submitted on behalf of the Authorizing Official registered in the HSES. **Incomplete applications will not be processed.**

Please ensure the application contains all of the required information. If you have any questions or need assistance, please contact Sherice Horton, Head Start Program Specialist, at 404-562-2822 or [sherice.horton@acf.hhs.gov](mailto:sherice.horton@acf.hhs.gov) or James Youngs, Grants Management Specialist, at 404-562-2921 or [james.youngs@acf.hhs.gov](mailto:james.youngs@acf.hhs.gov).

For technical assistance in preparing the application, please contact the HSES Help Desk at [help@hsesinfo.org](mailto:help@hsesinfo.org) or 1-866-771-4737.

Sincerely,

The Office of Head Start

### **Attachment A**

#### **Allowable Uses of Quality Improvement Funds**

The language in this document comes directly from Sec. 640(a)(5) of the Head Start Act, except that language has been removed from no. 1 specifying that at least 50 percent of the funds must be used for staff compensation and language has been removed from no. 8 specifying that no more than 10 percent of the funds can be used on transportation to align with the FY 2020 enacted appropriation language.

1. To improve the compensation (including benefits) of educational personnel, family service workers, and child counselors, as described in Sections 644(a) and 653 of the Head Start Act, in the manner determined by the Head Start agencies (including Early Head Start agencies) involved, to—
  - ensure that compensation is adequate to attract and retain qualified staff for the programs involved in order to enhance program quality;
  - improve staff qualifications and assist with the implementation of career development programs for staff that support ongoing improvement of their skills and expertise; and
  - provide education and professional development to enable teachers to be fully competent to meet the professional standards established under Sec. 648A(a)(1) of the Act, including—
    - providing assistance to complete postsecondary course work;
    - improving the qualifications and skills of educational personnel to become certified and licensed as bilingual education teachers, or as teachers of English as a second language; and
    - improving the qualifications and skills of educational personnel to teach and provide services to

children with disabilities

2. To support staff training, child counseling, and other services necessary to address the challenges of children from immigrant, refugee, and asylee families; homeless children ; children in foster care; limited English proficient children; children of migrant or seasonal farmworker families; children from families in crisis; children referred to Head Start programs (including Early Head Start programs) by child welfare agencies; and children who are exposed to chronic violence or substance abuse.
3. To ensure that the physical environments of Head Start programs are conducive to providing effective program services to children and families, and are accessible to children with disabilities and other individuals with disabilities.
4. To employ additional qualified classroom staff to reduce the child-to-teacher ratio in the classroom and additional qualified family service workers to reduce the family-to-staff ratio for those workers.
5. To ensure that Head Start programs have qualified staff that promote the language skills and literacy growth of children and that provide children with a variety of skills that have been identified, through scientifically based reading research, as predictive of later reading achievement.
6. To increase hours of program operation, including—
  - conversion of part-day programs to full-working day programs; and
  - increasing the number of weeks of operation in a calendar year.
7. To improve communitywide strategic planning and needs assessments for Head Start programs and collaboration efforts for such programs, including outreach to children described in no. 2 above.
8. To transport children in Head Start programs safely.
9. To improve the compensation and benefits of staff of Head Start agencies, in order to improve the quality of Head Start programs.

## **Attachment B**

### **Office of Head Start Guidance on Implementing a Trauma-Informed Approach**

Trauma occurs when frightening events or situations overwhelm a child or adult's ability to cope or deal with what has happened. These kinds of experiences cause an extended stress response and lasting effects on the physical and mental health of the individual. Trauma can occur in the form of a single event (e.g., a natural disaster or death of a close family member) or as a series of events or chronic condition (e.g., substance misuse, domestic and community violence, child abuse and neglect, extended homelessness, or food insecurity). Exposure to trauma is more common than most people believe. It is also multi-layered, with individual, community, and historical experiences. In addition to enrolled children and families, Head Start staff may experience trauma as well, along with stress associated with their role in supporting children and families impacted by trauma. That said, not everyone exposed to adverse experiences is traumatized.

Head Start and Early Head Start programs play a critical role in buffering the impact of trauma by promoting resilience for children, families, and staff. The effects of trauma are lessened by protective factors such as strong parent-child relationships; relationships between staff, children, and families in Head Start and Early Head Start

programs; and through relationships and supports within the community. Supporting staff wellness is a critical part of any trauma-informed approach in Head Start programs.

The Substance Abuse and Mental Health Services Administration (SAMHSA) defines a trauma-informed approach as one that: 1) **realizes** the widespread impact of trauma and understands potential paths for recovery; 2) **recognizes** potential signs and symptoms of trauma; 3) **responds** by fully integrating knowledge about trauma into program policies, procedures, and practices; and 4) **resists** re-traumatization of impacted individuals. For more information, please see [SAMHSA's Concept of Trauma and Guidance for a Trauma-Informed Approach](#)

### **Head Start Considerations for Funding Trauma-Informed Approaches**

There are many ways Head Start and Early Head Start programs can use Quality Improvement funds to implement a comprehensive, ongoing trauma-informed approach. The following includes a limited, non-exhaustive list of examples:

#### **Expand Mental Health Services**

- Improve preventive mental health screening, assessment, and interventions
- Enhance mental health consultation for staff support and organizational improvement to help identify signs and symptoms of trauma and integrate supports and services to assist in healing
- Ensure mental health consultation and other related intervention services include a trauma-informed approach and are integrated at intake and orientation
- Build and/or enhance collaborative services with local substance abuse and mental health treatment programs, domestic violence service providers, disaster response programs, child welfare agencies, and others

#### **Increase Classroom Quality**

- Hire additional qualified education staff to lower classroom ratios, enhance caregiver-child relationships
- Provide ongoing coaching and support to education staff to address secondary stress and related turnover
- Hire behavioral specialists to support children, classroom staff, and parents
- Improve physical environments and learning spaces throughout the facility to help address the multiple domains of development and learning that are impacted by trauma
- Invest in professional development and staffing patterns that foster continuity of care, and consistent, predictable, and nurturing environments

#### **Strengthen Family Services**

- Enhance services that strengthen families, promote relationships, decrease parental stress, and improve family safety and financial security
- Strengthen service provision related to housing access and stability
- Provide enhanced job training, employment, education, and career services
- Help families better access healthcare and nutrition services
- Enhance transportation services to promote more regular participation by children and families in services designed to support development and learning and address trauma
- Improve collaboration efforts and alignment with family-serving agencies to lessen family confusion and stress in dealing with multiple agencies

### **Support a Trauma-Informed Workforce**

- Provide training on trauma-informed approaches to all staff, governing boards, and Policy Councils, and ensure training is accompanied with coaching and opportunities for reflective practice and supervision
- Support staff capacity with salary increases and additional benefits, such as employee assistance services and break times
- Decrease family service staff and/or home visitor caseloads through hiring of additional qualified staff or other strategies

### **Create a Program-Wide Trauma-Informed Environment**

- Ensure any trauma-informed training implemented at the management-, governing-, or policy-level includes oversight to examine how the approach is being implemented
- Conduct ongoing self-assessment to track program improvements related to integrating a trauma-informed approach over time
- Expand Health Services Advisory Committee efforts to better support health and mental health services for children and families by implementing trauma-informed approaches