

**Arlene V. Dobison, CCAP, NCRI**  
Chief Executive Officer

**Corporate Office**  
300 Lynchburg Road  
Lake Alfred, Florida 33850-2576  
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www.alpi.org

**ADMINISTRATION & OPERATIONS DIVISION**

**ADMINISTRATION SERVICES**

Executive Office  
Budget & Finance  
Human Resources  
IT/Computer Support & Marketing

**COMMUNITY SERVICES & ECONOMIC DEVELOPMENT DIVISION**

**CSBG Services**

**Service Areas:** Glades, Hendry, Highlands and Polk Counties

**Farmworker Emergency Services**

**Service Areas:** Statewide

**LIHEAP Services**

**Service Areas:** Collier, Glades, Hendry, Highlands, Martin, Polk and St. Lucie Counties

**Housing Counseling Services**

**Service Area:** Polk County

**Training and Employment Services**

**Service Areas:** Glades, Hendry, Highlands, Polk, St. Lucie and Volusia Counties

**ALPI Technical Education Center**

**Service Area:** Volusia County

**EHEAP Services**

**Service Area:** Polk County

**CHILD DEVELOPMENT & FAMILY SERVICES DIVISION**

**Head Start Services**

**Service Area:** St. Lucie and Martin Counties

**Early Head Start Services**

**Service Areas:** Polk, St. Lucie and Martin Counties

**Child Care**

**Service Areas:** Polk (Frostproof) and St. Lucie Counties

**Child Care Food**

**Service Areas:** Polk (Frostproof) and St. Lucie Counties

**Voluntary Pre-Kindergarten (VPK) Services**

**Service Areas:** Polk and St. Lucie Counties

**School Readiness Services**

**Service Areas:** Polk and St. Lucie Counties

**Computer Assisted Tutorial Program (CAT)**

**Service Area:** St. Lucie County

**Eastern Region Administration Office**

2202 Avenue Q  
Ft. Pierce, FL 34950  
(772) 466-2631  
Toll Free: 1 (800) 791-3099  
Fax: (772) 464-3035



## WELCOME MESSAGE FROM THE CEO

On behalf of the ALPI Board of Directors, under the leadership of Mr. William Holt, Board Chairperson, it is with pleasure that I welcome you to The Agricultural and Labor Program, Inc.'s 2022 Shared Governance Orientation, and training session.

Our orientation is designed to provide newly elected Board members, veteran board members, Head Start/EHS Policy Council Members and Regional Advisory Council Members an overview of the agency's governance practices and regulatory requirements. The Orientation ensures, ongoing, effective management oversight of the agency's governance practices, by the Board of Directors, with active participation in the decision-making process by the Head Start/EHS Policy Council and Regional Advisory Councils, when applicable.

This formal, Shared Governance Orientation, is the first step towards ensuring board members, Head Start/EHS Policy Council Members, and Regional Advisory Council Members are active, engaged, educated, and ready to move forward collectively, in a participatory democracy, self-determination and genuine shared governance partnership.

I sincerely appreciate everyone for attending and I "Thank You" for coming.

Sincerely,

Arlene Dobison, CCAP, NCRI  
Chief Executive Officer

PROGRAMS AND SERVICES ARE FUNDED IN PART BY:



United Way of Central Florida and United Way of St. Lucie County

THE AGRICULTURAL AND LABOR PROGRAM, INC. — PROVIDING A CONSTANT FLOW OF COMMUNITY SERVICES SINCE 1968  
AN EQUAL OPPORTUNITY EMPLOYER

**Shared Governance Orientation and Training**  
**DoubleTree by Hilton Hotel Orlando at SeaWorld**  
**10100 International Drive, Orlando, FL**  
**Saturday, February 26, 2022 | 9:00 A.M.**  
**Agenda**

Time	Activity	Presenter
9:00 A.M.	Welcome and Introduction of Attendees	William Holt, ALPI Chairperson Arlene Dobison, ALPI CEO
	<b>Session I</b>	
9:30 AM - 11:00 AM	COVID-19 Vaccines: Step-by-step Guide for Community Action	Allison Ma'Luf, Executive Director/ General Counsel CAPLAW
	Composition of Head Start Policy Council / ERSEA	Myrna Rodriguez, Child Development & Family Services Division Director
	ROMA Series: Beyond the Basics	Al Miller , Community Services & Economic Development Division Director
11:00 AM–11:10 AM	Break	
	<b>Session II</b>	
11:10 AM - 12:15 PM	All a - Board! Duty of Care (Purpose)	Video
	Manual Contents  Governance: The power of Decision Making	William Holt, ALPI Board Chairperson Arlene Dobison, ALPI CEO
12:15 PM - 12:30 PM	Questions and Answers Wrap Up	William Holt Arlene Dobison

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- Articles of Incorporation

## 2. ORGANIZATION STRUCTURES

- Governance and Agency wide Management Structure
- Shared Governance Structure
- Board of Directors' Roster
- Head Start/Early Head Start Policy Council Roster
- Regional Advisory Council Roster's

## 3. SHARED GOVERNANCE OPERATIONS

### Board of Directors

- Bylaws
- Board of Directors Policy Manual
- Board Job Description
- Proposed Committee Assignments
- Board Meeting Attendance Reporting Format (Sample)
- Meeting Minutes (Sample)
- Board of Directors Membership Application
- Indirect Cost Allocation
- Board Annual Report (See 2022 Annual Meeting & Luncheon Booklet)
- Election of Board Members/Officers Procedures
- **CEO Job Description**
- **CEO Performance Evaluation**
- **CEO Compensation Regulation**
- **D&O Insurance Coverage**
- **Succession Planning Guide**

### Head Start/EHS Policy Council

- By-Laws
- Meeting Attendance Report Form (Sample)
- Meeting Minutes (Sample)
- Election of Policy Council Members/Officers Procedures (See By-Laws)
- Annual Meeting Report (See 2022 Annual Corporate Meeting & Luncheon Booklet)
- Advisory, Policy Committee & Policy Council Handbook (see Agency and Shared Governance Policies and Procedures Section)

### Advisory Councils

- Council Job Descriptions (Sample)
- Committee Assignments (See Board of Directors)
- Meeting Attendance Format (Sample)
- Meeting Report Form (Sample)
- Corporate Membership Application
- Advisory, Policy Committee & Policy Council Handbook (see Agency and Shared Governance Policies and Procedures Section for details)
- Regional Advisory Council Election Procedures (Sample)
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- News Releases and Public Information Policy
- Head Start Program Governance Performance Standards
  - 2021 Head Start Focus Areas Monitoring Protocol
  - Head Start Governance Reference Book
  - Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA)
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- Risk Management Assessment Checklist

## 5. PROGRAMS AND SERVICES

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- Agency Five-Year Strategic Plan

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- Training & Professional Development Opportunities
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- Proclamations and Official Greetings (see 2022 Annual Corporate Meeting & Luncheon Booklet)

# FACTS ABOUT THE AGENCY

**The Agricultural and Labor Program, Inc. (ALPI)** is a private, nonprofit, community-based organization chartered by the State of Florida to provide assistance and services to the migrant and seasonal farm workers' population, the rural poor, and disenfranchised throughout the state. The program is designed to promote involvement of the poor in the decision-making process that affects their lives.

In the Spring of 1977, a new headquarters office of The Agricultural and Labor Program, Inc. was dedicated in a ribbon cutting ceremony near Winter Haven, Florida. The occasion pointed up a significant milestone for the Agricultural Labor Project which the Coca-Cola Company Foods Division established in 1968 to raise the quality of life for farm workers in its Florida citrus operations. Now restructured as an incorporated entity, The Agricultural and Labor Program, Inc. is well into an extended program reaching beyond the employees of Coca-Cola.

ALPI's programs are based on five underlying principles that guide its activities. They are as follows:

1. **Involvement of People:** Programs will be effective only to the extent that they fully involve workers themselves in determining solutions to their own problems thereby creating their own destiny.
2. **Emphasis on long-term Accomplishments Rather Than Promises:** The emphasis of the programs must be on accomplishments rather than promises.
3. **Assurance of Economic Viability:** The programs will be truly successful only when their economic base is viable, self - sustaining, and self-expanding.
4. **Emphasis on self-help:** Programs will emphasize the self-help potentials that exist within all individuals.
5. **A Sound Integrated Total Systems Approach:** The complexities of the problems confronted in the projects call for systematic, sustained, and fully integrated approaches to bring about social change.

The organization, as mandated by the Guiding Principles, designs and seeks funding for programs that are addressed to the following areas:

**Social Services, Employment and Training, Child Development, Housing, Community Awareness, Energy, Education, Health Education, Information and Referral, Nutrition and Economic Development**

In the years since the project was originally founded by Coca-Cola, The Agricultural and Labor Program, Inc. has continued to grow and to expand agency efforts to assist those persons that the organization was chartered to *serve*. This effort is continuous and will exist as long as there are persons needing service.

For this reason, The Agricultural and Labor Program, Inc. will always be known as "**A Project in Progress.**"

# MISSION

To collaborate with community partners and deliver human service programs that empower the economically disadvantaged and others to be self-sufficient

# VISION

To be the premier poverty fighting Community Action Agency in America

# THE COMMUNITY ACTION PROMISE

Community Action changes people's lives, embodies the spirit of hope, improves communities and makes America a better place to live.

We care about the entire community and we are dedicated to helping people help themselves and each other.

# STATE OF FLORIDA

DEPARTMENT OF STATE



I certify that the following is a true and correct copy of

## CERTIFICATE OF INCORPORATION

OF

THE AGRICULTURAL AND LABOR PROGRAM, INCORPORATED

filed in this office on the 3rd day of May,

19 76

Charter Number: 735710

GIVEN under my hand and the Great  
Seal of the State of Florida, at  
Tallahassee, the Capital, this the  
3rd day of May,  
19 76.

SECRETARY OF STATE

FILED  
MAY 3 4 24 PM '16  
SECRETARY OF STATE  
TALLAHASSEE, FLORIDA

ARTICLES OF INCORPORATION  
OF  
THE AGRICULTURAL AND LABOR PROGRAM, INCORPORATED  
(A Corporation Not For Profit)

The undersigned subscribers to these Articles of Incorporation, each a natural person competent to contract, hereby voluntarily associate themselves together to form a Corporation, not for profit, under the laws of the State of Florida, and do hereby certify:

ARTICLE I - NAME

The name of this Corporation is The Agricultural and Labor Program, Incorporated. The initial street address of the principal office of the Corporation is 7301 Lynchburg Road, Winter Haven, FL.

ARTICLE II - PURPOSE

The specific purpose for which this Corporation is formed is to assist agricultural workers, disadvantaged, disenfranchised persons and other interested members of the community and their family members in cooperatively meeting their needs for better health, education, social services, home life, economic opportunities and human relation. In furtherance of this purpose, the Corporation shall have all powers conferred by Chapter 617 of the Florida Statutes, and those powers, rights and privileges shall include, but are not limited to the following: to provide research for the foregoing purposes; to provide advisory service to disadvantaged agricultural workers and disenfranchised people; to develop projects and to help aid and assist their furtherance; to provide leadership training for those involved in service to agricultural workers, disadvantaged and disenfranchised people; to find, train, and assist volunteers in service to agricultural workers, disadvantaged and disenfranchised people; to provide and assist in the obtaining of suitable housing; to provide funds

whenever possible for training and assisting; to assist in welfare programs but to engage in such welfare programs as are feasible; to participate in, to the fullest extent practicable, all Governmental Programs as passed in the Congress of the United States of America; to acquire funds from any source for all of the foregoing purposes, such as foundations, state and Federal Government agencies, or corporations, but not limited to, in the support of the foregoing purposes, and to expand the same with the full discretion of the Board of Directors and Executive Committee as created hereinafter on a non-profit basis; to create an Advisory Council in each of the four regional offices currently in operation, Southern, Eastern, Central and Northern, and to continue same in any new regional offices that may be created for the purpose of aid and counsel to the Board of Directors; to participate in such other charitable and philanthropic projects and activities as shall from time to time be feasible, and to do any and all manner of things as may be necessary to carry out the intents and purposes of this section; and to carry out the above activities in the State of Florida and such other states as the Board of Directors may determine.

In order to promote the purposes of this corporation, it may acquire property by grant, gift, purchase, devise or bequest, and hold, mortgage and dispose of such property as the corporation shall require for the benefit of the members and not for pecuniary profit.

To do any and all other things necessary or proper to the achievement of any or all of the above purposes and to any and all things permitted to non-profit organizations under any by virtue of the Laws of the State of Florida and the United States.

The foregoing provisos of this Article are to be construed as both objects and powers, and it is expressly provided that said objects and powers shall in no sense be limited by any other proviso of these Amended Articles of Incorporation, but shall be regarded as independent objects and powers, provided, however, that nothing herein contained shall be construed as authority to carry

on business or exercise any power or undertake any act which may be inconsistent with Chapter 617 of the Florida Statutes, or in anywise inconsistent with Section 501 (c)(3) of the Internal Revenue Code of 1954.

ARTICLE III - QUALIFICATION FOR MEMBERSHIP

All agricultural workers, disadvantaged, disenfranchised persons and other interested members of the Community and those persons who subscribed to the objectives and purposes of this Corporation are qualified for membership. Members shall be admitted upon application for membership and approval of their application at the regional areas. The regionals may, in their discretion, admit applicants whether or not they reside in the State of Florida or another state.

ARTICLE IV - TERM

This Corporation shall have perpetual existence.

ARTICLE V - SUBSCRIBERS

The names and residences of the Subscribers hereto are as follows:

<u>Names</u>	<u>Addresses</u>
Leroy McGill	Rt. 1 - Box 144, Polk City, FL 33868
Elizabeth Hudson	2516 Experiment Stn. Rd, Polk City, FL
Mary L. Sauls	P. O. Box 3786, Winter Haven, FL 33880
Willie Axson	Rt. 1 - Box 144, Polk City, FL 33868
Wilbert McTier	1926 Third St., NE, Winter Haven, FL 33880
Arabelle Wiggins	2303 Ninth Court, NE, Winter Haven, FL 33888

ARTICLE VI - OFFICERS

Section 1. The officers of the corporation shall be a Chairman, Vice-Chairman, Secretary, and a Treasurer who shall hold office until their successors are duly elected and shall have qualified, and such other officers as may be provided for in the By-Laws.

Section 2. The names of the persons who are to serve as officers of the corporation until the first meeting of the Board of Directors are:

<u>Office</u>	<u>Name</u>
Chairman	Leroy McGill
Vice-Chairman	Elizabeth Hudson
Secretary	Marv L. Sauls
Treasurer	Willie Axson

Section 3. The officers shall be elected by the Board of Directors from their own number at the first meeting of the Board of Directors following the annual meeting of the corporation or as provided in the By-laws.

Section 4. Interim vacancies in the officers of the corporation shall be filled by the Board of Directors as provided in the By-laws.

ARTICLE VII - DIRECTORS

Section 1. The business affairs of this corporation shall be managed by a Board of Directors consisting of not less than six (6) nor more than twenty-four (24) members of which four will be appointed at-large by the designated Board of Directors. The number of Directors may be increased from time to time, by the By-laws, but shall never be less than six (6).

Section 2. The Board of Directors shall be members of either the Southern, Eastern, Central or Northern regions with the exception of four (4) members to be appointed at-large by the designated Board of Directors.

Section 3. Members of the Board of Directors shall be elected and hold office in accordance with the By-laws.

Section 4. Any new Regions created will have equal representation on the Board of Directors with those already in existence.

Section 5. Interim vacancies in the elected members of the Board of Directors shall be filled by the Regional Advisory Council from which that member came, or, as provided for in the By-laws.

Section 6. The name and addresses of the persons who are to serve as Directors until their successors are duly elected and shall have qualified, are:

<u>Name</u>	<u>Address</u>
Leroy McGill	Rt. 1 - Box 144, Polk City, FL 33868
Elizabeth Hudson	2516 Experiment Stn. Rd., Polk City, FL
Mary L. Sauls	P. O. Box 3786, Winter Haven, FL 33880
Willie Axson	Rt. 1 - Box 144, Polk City, FL 33868
Wilbert McTier	1926 Third St., NE, Winter Haven, FL 33880
Arabelle Wiggins	2303 Ninth Court, NE, Winter Haven, FL 33880

#### ARTICLE VIII\* - REGIONAL ADVISORY COUNCIL

Section 1. The corporation shall be divided into four (4) regions, Southern, Eastern, Central and Northern, with each region being headed by a Regional Advisory Council, each Regional Advisory Council shall consist of a membership of not less than four (4) nor more than eighteen (18), and who shall be selected as provided in the By-laws.

Section 2. Regions may be added or modified as provided in the By-laws.

Section 3. The duties and responsibilities of the Regional Advisory Councils shall be as determined in the By-laws.

#### ARTICLE IX - BY-LAWS

Section 1. The By-laws of the corporation shall be made, altered, amended or rescinded at the annual meeting of the corporation by a two-thirds vote of those voting in person. All amendments brought before the annual meeting must be submitted to the Board of Directors in written form at least one (1) month prior to the annual meeting.

Section 2. The By-laws may also be amended at a special meeting of the corporation called by the Board of Directors for the specific purpose of amending the By-laws. A two-thirds vote of those persons voting in person is required for amendment. All amendments brought before the Corporation must be submitted in written form at least one (1) month prior to the corporation meeting.

#### ARTICLE X - ARTICLES OF INCORPORATION

Amendments to the Articles of Incorporation may be proposed by any member of the corporation, and upon affirmative vote by two-thirds of the Board of Directors recommending the adoption of same, said amendment shall be submitted to a vote of the membership. Upon approval of a proposed amendment by two-thirds of the membership present at such meeting, and the filing thereof with the Secretary of State, any such proposed amendment shall become effective.

ARTICLE XI - NON-PROFIT STATUS

No part of the net earnings of the corporation shall inure to the benefit of any individual or member.

ARTICLE XI - DISSOLUTION

Should this Corporation be dissolved, other than incident to merger or consolidation, the assets of the Corporation shall be dedicated, granted, conveyed and assigned to any non-profit public or private agency, corporation, association, trust or similar organization devoted to and used for purposes similar to those for which this Corporation was created, so long as said grant, dedication, conveyance or assignment shall not be inconsistent with Section 501 (c)(3) of the Internal Revenue Code of 1954.

IN WITNESS WHEREOF, we, the undersigned subscribing incorporators, have hereunto set our hands and seals this 9<sup>th</sup> day of February, 1976, for the purpose of forming this corporation not for profit under the laws of the State of Florida.

Leroy McGill (SEAL)  
Leroy McGill

Elizabeth Hudson (SEAL)  
Elizabeth Hudson

Mary L. Sauls (SEAL)  
Mary L. Sauls

Willie Axson (SEAL)  
Willie Axson

Wilbert McTier (SEAL)  
Wilbert McTier

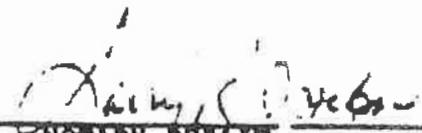
Arabelle Wiggins (SEAL)  
Arabelle Wiggins

STATE OF FLORIDA :  
: SS  
COUNTY OF POLK :

I HEREBY CERTIFY that on this day, before me, an officer duly authorized to take acknowledgments, personally appeared Leroy McGill, Elizabeth Hudson, Mary L. Sauls, Willie Axson, Wilbert McTier and Arabelle Wiggins to me well known to be the subscribers to the foregoing Articles of Incorporation of THE AGRICULTURAL AND LABOR PROGRAM, INCORPORATED, who, being by me, first duly sworn,

acknowledged that they signed the same for the purpose therein expressed.

WITNESS my hand and seal at Auburndale, Florida, this  
9th day of February 1976.

  
\_\_\_\_\_  
NOTARY PUBLIC  
State of Florida at Large

MY COMMISSION EXPIRES: \_\_\_\_\_

NOTARY PUBLIC STATE OF FLORIDA  
MY COMMISSION EXPIRES FEBRUARY 1976  
IN WITNESS WHEREOF I HAVE HEREON SET MY HAND AND SEAL  
AT AUBURNDALE, FLORIDA

CERTIFICATE DESIGNATING PLACE OF BUSINESS OR DOMICILE FOR THE SERVICE OF PROCESS WITHIN FLORIDA, NAMING AGENT UPON WHOM PROCESS MAY BE SERVED

IN COMPLIANCE WITH SECTION 48.091, FLORIDA STATUTES, THE FOLLOWING IS SUBMITTED:

FIRST--THAT The Agricultural and Labor Program, Incorporated.  
(NAME OF CORPORATION)

DESIRING TO ORGANIZE OR QUALIFY UNDER THE LAWS OF THE STATE OF FLORIDA,  
WITH ITS PRINCIPAL PLACE OF BUSINESS AT CITY OF Winter Haven  
(CITY)

STATE OF Florida, HAS NAMED William H. Ravenell  
(STATE) (NAME OF RESIDENT AGENT)

LOCATED AT 1600 Laguna Drive  
(STREET ADDRESS AND NUMBER OF BUILDING,  
POST OFFICE BOX ADDRESSES ARE NOT ACCEPTABLE)

CITY OF Tallahassee, STATE OF FLORIDA, AS ITS AGENT TO ACCEPT  
(CITY)

SERVICE OF PROCESS WITHIN FLORIDA.

FILED

May 3 4 26 PM '76

SECRETARY OF STATE  
TALLAHASSEE, FLORIDA

SIGNATURE \_\_\_\_\_  
(CORPORATE OFFICER)

TITLE \_\_\_\_\_

DATE \_\_\_\_\_

HAVING BEEN NAMED TO ACCEPT SERVICE OF PROCESS FOR THE ABOVE STATED CORPORATION, AT THE PLACE DESIGNATED IN THIS CERTIFICATE, I HEREBY AGREE TO ACT IN THIS CAPACITY, AND I FURTHER AGREE TO COMPLY WITH THE PROVISIONS OF ALL STATUTES RELATIVE TO THE PROPER AND COMPLETE PERFORMANCE OF MY DUTIES.

SIGNATURE William H. Ravenell  
(RESIDENT AGENT)

DATE May 3, 1976

AMENDMENT TO THE ARTICLES OF INCORPORATION  
OF THE AGRICULTURAL AND LABOR PROGRAM, INCORPORATED  
APPROVED AT THE JANUARY 16, 1982 ANNUAL CORPORATE MEETING  
IN LAKELAND, FLORIDA

FILED  
JUL 19 11 18 AM '82  
REG. CLERK  
TALLAHASSEE, FLORIDA

Articles of Amendment to the Articles of Incorporation

ARTICLE VII DIRECTORS

Section 2. The Board of Directors shall be members of the Southern, Eastern, Central and Northern Regions, with the exception of four (4) members to be appointed at large by the official Board of Directors. Each region shall elect an equal number of Directors. This article was approved at the January 16, 1982 Annual Corporate Meeting by the Board of Directors.

Date

7/15/82

Charles Willingham  
Charles Willingham, Chairman of the  
Board of Directors  
THE AGRICULTURAL AND LABOR PROGRAM  
INCORPORATED

Date

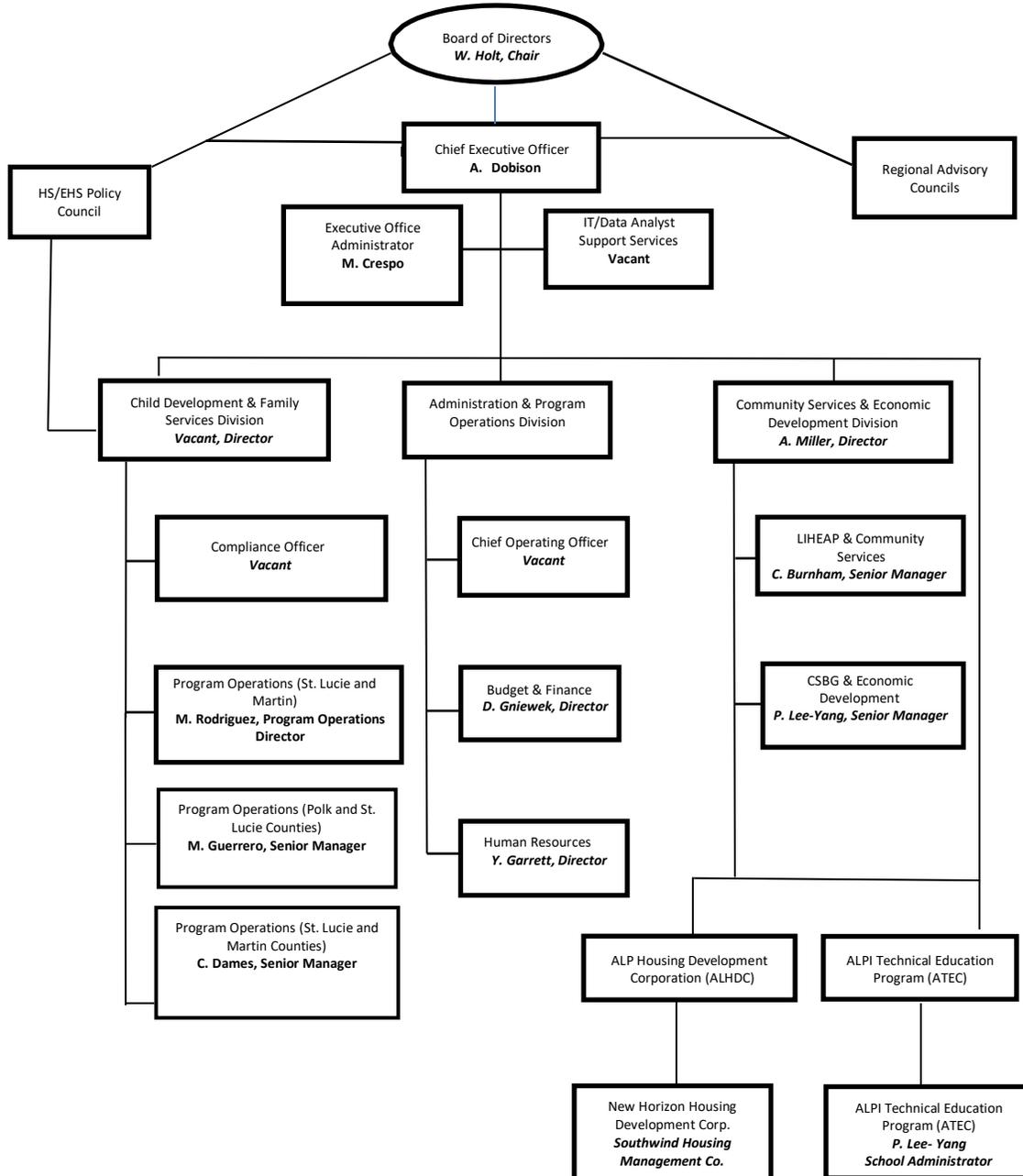
7/15/82

Georgia Johnson  
Georgia Johnson  
Secretary  
of the Board of Directors  
THE AGRICULTURAL AND LABOR PROGRAM  
INCORPORATED

Mable Hansell  
NOTARY

# The Agricultural and Labor Program, Incorporated (ALPI)

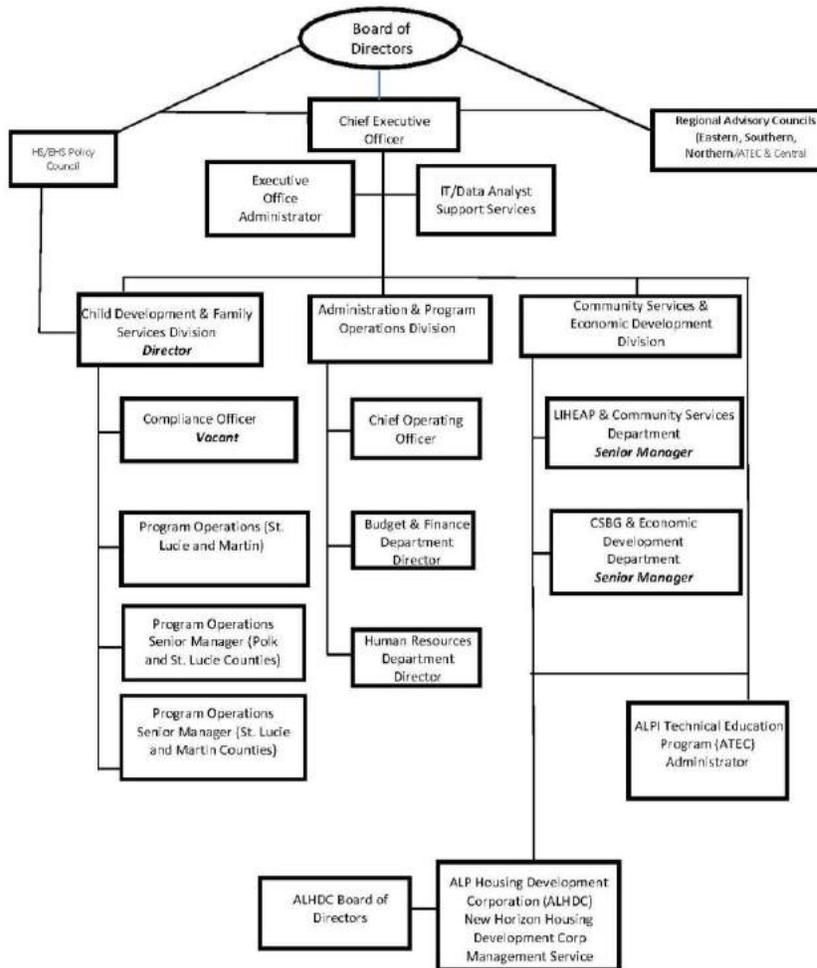
## ORGANIZATION STRUCTURE



## ORGANIZATION STRUCTURE AT-A-GLANCE

The Agricultural and Labor Program, Inc.'s capacity to establish and maintain effective oversight of program operations and accountability for federal funds starts with the Board of Directors who continues to demonstrate a strong foundation of leaderships at the national, state and local levels. Moreover, the Board of Directors are legally and fiscally responsible and continue to demonstrate its effective oversight of quality services for the children and families for making decisions related to program design and implementation; under the leadership of the Chief Executive Officer who is responsible for leading the organization and its staff in pursuit of the goals and objectives established by the Board in the organization's Strategic Plan and annual operating plan. The following chart represents ALPI's Governance and Agency- Wide Management Organizational Structure.

The Agricultural and Labor Program, Incorporated (ALPI)  
Governance & Agency-Wide Management  
Organizational Structure

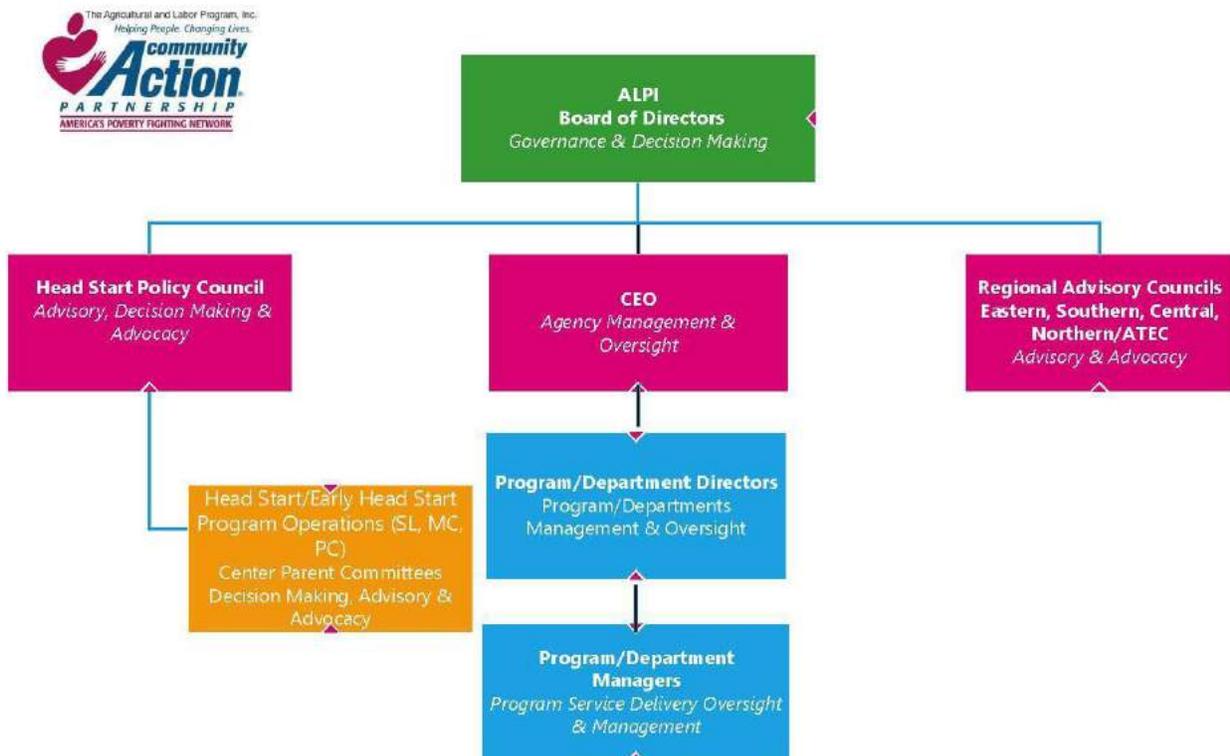


# SHARED GOVERNANCE STRUCTURE AT-A-GLANCE

## BOARD OF DIRECTORS

The Agricultural and Labor Program, Inc. (ALPI) is a non-profit Organization that is governed by a 21 (voting) member Board of Directors. The ALPI Board membership consists of representatives from the Regional Advisory Councils, the Head Start Policy Council and the community at large. ALPI is governed in accordance with its established By-laws, which include the function and purpose of the Councils.

The Board of Directors composition consists of not less than nine (9) or more than twenty-four (24) voting members. The Board membership, in accordance with the CSBG Tripartite Requirement, is equally divisible by three (3) at all times. All Board members eligible to vote will be identified by one of three designations. These are: (1) Elected public officials; (2) Low income community representatives; and (3) Local business leaders/others.



SHARED GOVERNANCE AND MANAGEMENT  
ORGANIZATIONAL STRUCTURE

February 2021

## **HEAD START/EARLY HEAD START POLICY COUNCIL**

The Head Start/EHS Policy Council is responsible for the direction of the Head Start program under the supervision and oversight of the ALPI Board of Directors, including the Head Start/Early Head Start program design and operation, and long- and short-term planning goals and objectives, taking into account the annual community wide strategic planning and needs assessment and self-assessment.

The Policy Council composition consists of 78% of parents whose children are currently enrolled in the Early Head Start Program; and 22% of Community Social Services agencies. Contracted Child Care Partners agree to deliver parent involvement and community services, which include establishing and maintaining an Early Head Start Parent Committee.

## **ADVISORY COUNCILS**

Advisory Councils to the organization serve important functions, they are vital to the success of the organization. Councils: (1) are good will ambassadors, (2) are knowledgeable about the missions of the organization, (3) support the organization, (4) are vital communication links to the communities that the organization serve, and (5) seek at all times to follow the rules designed by the organization.

Unlike the Policy Council and Policy Committees, who are decision makers, the advisory councils do not make decisions for the organization. They advise decision-makers who may use the advice given them in making decisions for the organization.

## **The Promise of Community Action**



**Community Action changes people's lives, embodies the spirit of hope, improves communities, and makes America a better place to live.**

**We care about the entire community, and we are dedicated to helping people help themselves and each other.**



**THE AGRICULTURAL AND LABOR PROGRAM, INC.**  
**2021-2022**  
**BOARD OF DIRECTORS**  
**MEMBERSHIP ROSTER**  
**(January - January)**

**Sector: Public**

<b>Name/Current Position on Board Representation Designation/County Employer/Position</b>	<b>Mailing Address (no P.O. Boxes) Email Address</b>	<b>Telephone # Home: Office: Cell:</b>	<b>Date when originally seated on board</b>	<b>Date when seated for current term</b>	<b>Total # of years served on board</b>	<b>Expiration date of current term</b>
Josephine Howard, Member City of Haines City Citizen Designee/Polk County Polk County School Board/Retired Principal <b>HS/EHS Area of Expertise: Early Childhood Services</b>	2711 Orchid Drive Haines City, FL 33844 Jolizhow13@yahoo.com	H: (863) 422-0875 O: N/A C: (863) 221-2644	January 1988	January 2021	34	January 2023
<b>Vacant</b> Citizen Designee/Seminole County						
Councilwoman Dr. Donna Mills, Member St. Lucie County School Board, Chairwoman Citizen Designee/St. Lucie County Self-Employed/Motivational Speaker	1330 SW Briarwood Drive Port St. Lucie, FL 34986 doctordonnamills@aol.com	H: N/A O: N/A C: (772) 267-7364	January 2022	January 2022	<1	January 2023
Marjorie Gaskin, Member Commissioner Rufus Alexander - City of Ft. Pierce Citizen Designee/St. Lucie County City of Ft. Pierce/Retired IT Director <b>HS/EHS Area of Expertise: Fiscal Management Services</b>	1511 N. 21 Street Ft. Pierce, FL 34950 mbgaskin2@gmail.com	H: (772) 464-0243 O: N/A C: (772) 475-3194	January 1982	January 2021	40	January 2023
Councilwoman Berniece Taylor, Member City of Avon Park Highlands County Yigati Services, LLC	207 Purcell Street Avon Park, FL 33825 taylorberniece@aol.com	H: N/A O: N/A C: (813) 338-3595	January 2022	January 2022	<1	January 2023
Emily Hunter, Member Commissioner Emma Byrd - Hendry BoCC Citizen Designee/Hendry County Communications & Legislative Coordinator	237 Frasier Ave LaBelle, FL 33935 emily.hunter@hendryfla.net	H: 863-673-3395 O: 863-675-5304 C: N/A	February 2021	February 2021	1	January 2023
Rashondra Croskey Commissioner Timothy Stanley: Glades County Citizen Designee/Glades County	Rashondra Croskey 1111 Cactus Ave. NW Moore Haven, FL 33471 mysunshine75@icloud.com	H: N/A O: N/A C: (863) 254-3225	January 2022	January 2022	<1	January 2023



**THE AGRICULTURAL AND LABOR PROGRAM, INC.**  
**2021-2022**  
**BOARD OF DIRECTORS**  
**MEMBERSHIP ROSTER**  
**(January - January)**

**Sector: Private**

Name/Current Position on Board Representation Designation/County Employer/Position	Mailing Address (no P.O. Boxes) Email Address	Telephone # Home: Office: Cell:	Date when originally seated on board	Date when seated for current term	Total # of years served on board	Expiration date of current term
Melvin Philpot Duke Energy Florida Seminole County Duke Energy/Program Manager	3698 Soaring LN, Sandford, FL 32773 Melvin.Philpot@duke-energy.com	H: (407) 304-6561 O: (407) 942-9332 C: (407) 496-3173	January 2021	January 2021	1	January 2023
Chester McNorton, Member ATEC Volusia County Training Initiative, Inc./Workshop Facilitator	644 Magnolia Avenue Daytona, FL 32114 chesterbmcnorton@yahoo.com	H: N/A O: (386) 740-3242 C: (386) 341-7586	January 2007	January 2021	15	January 2023
<b>Vacant</b> - Polk County						January 2022
<b>Vacant</b> - Polk County						January 2022
Stacy Campbell-Domineck, Vice Chairperson CareerSource Polk Polk County	600 N. Broadway, Suite B Bartow, FL 33830 stacy.campbell-domineck@careersourcepolk.com	H: (863) 899-6597 O: (863) 508-1600 C: N/A	February 2016	January 2021	6	January 2023
Tonmiel Rodriguez, Member Tonmiel Rodriguez Law Firm, PA Polk County	690 E. Davidson Street Bartow, FL 33830 Tonmiel@trlawpa.com	H: (N/A) O: (863) 774-4556 C: (863) 602-9984	November 2018	January 2021	4	January 2023
Gena L. Spivey Greater New Bethel Baptist Church Eastern Region Advisory Council St. Lucie County Retired	2310 S. E. Shelter Drive Port St. Lucie, FL 34952 genaspivey@att.net	H: N/A O: N/A C: (772) 360-8840	April 2021	April 2021	<1	April 2023



**THE AGRICULTURAL AND LABOR PROGRAM, INC.**  
**2021-2022**  
**BOARD OF DIRECTORS**  
**MEMBERSHIP ROSTER**  
**(January - January)**

**Sector: Low Income**

Name/Current Position on Board Representation Designation/County Employer/Position	Mailing Address (no P.O. Boxes) Email Address	Telephone # Home: Office: Cell:	Date when originally seated on board	Date when seated for current term	Total # of years served on board	Expiration date of current term
William Holt, Board Chairperson Eastern Region Advisory Council Indian River County Helseth Financial/Retired Mortgage Banker	4129 57th Avenue Vero Beach, FL 32967 1946holt@gmail.com	H: (772)562-8377 O: N/A C: (772) 538-4280	January 1990	January 2021	32	January 2023
Annie Robinson Southern Region Advisory Council Polk County East Coast Migrant HS/Retired Educator	748 Hunt Drive Lake Wales, FL 33853 annrobinson1226@yahoo.com	H: (863) 676-4008 O: (863) 285-8210 C: (863) 412-1889	January 2020	January 2022	2	January 2024
Annette Jones, Member Southern Region Advisory Council Glades County DEO/Employment Security Representative	3064 Calliope Drive Avon Park, FL 33825 annettejon@gmail.com	H: N/A O: (863) 773-3435 C: (863) 443-0269	September 2017	January 2022	3	January 2024
David Rucker, Member Northern Region Advisory Council Orange County Orange Co. Public Schools/Retired	4557 Frisco Circle Orlando, FL 32808 freedman7@bellsouth.net	H: (407) 299-7672 O: (407) 247-8876 C: N/A	June 2019	January 2021	3	January 2023
Ruby Willix, Member Central Region Advisory Council Polk County State of Florida/Retired Clerical Supervisor	2876 Dudley Drive Bartow, FL 33830 rubywillix@comcast.net	H: (863) 537-6677 O: N/A C: (863) 207-1822	January 2008	January 2022	13	January 2024
N'Kosi Jones, Member Southern Region Advisory Council Hendry County Synergy Recycling/Truck Driver	4829 Sally Boulevard Bowling Green, FL 33834 jones_nkosi@yahoo.com	H: N/A O: N/A C: (850) 207-2808	November 2018	January 2021	4	January 2023
Yolanda Robinson Head Start/Early Head Start Policy Council St. Lucie County HS/EHS Area of Expertise: Head Start Parent	2007 Avenue Q Fort Pierce, FL 34950 yolanda_wright216@yahoo.com	H: N/A O: N/A C: (772) 924-8978	October 2018	January 2022	4	September 2022

**Agricultural and Labor Program, Inc.  
2021-2022 Head Start/Early Head Start Policy Council Roster**

<b>REPRESENTATIVES</b>						
<p>Valerie Bienaime 457 S.W. Prater Avenue Port St. Lucie, FL 34953 (954) 864-8410 <a href="mailto:vbienaime57@gmail.com">vbienaime57@gmail.com</a></p> <p><b>Child Development &amp; Family Services</b></p>	<p>Ciara May 516 S. 5<sup>th</sup> Street #3 Fort Pierce, FL 34982 (772) 475-4664 <a href="mailto:Ciamamay1234@yahoo.com">Ciamamay1234@yahoo.com</a></p> <p><b>Francina Duval Head Start</b></p>	<p>Joanne Saintelus 208 Petals Road Apt. Q Fort Pierce, FL 34947 (786) 719-2703 <a href="mailto:Keila075@gmail.com">Keila075@gmail.com</a></p> <p><b>George W. Truitt Family Services</b></p>	<p>Kierra Guy Hill 1413 G Terrace Fort Pierce, FL 34947 (772)528-4598 / (314) 494-0425 <a href="mailto:Ladykierra2001@gmail.com">Ladykierra2001@gmail.com</a> <b>SECRETARY</b> Queen Townsend HS Center II</p>	<p>Yolanda Robinson 1655 N. 29<sup>th</sup> Street, #403 Fort Pierce, FL 34947 (772) 924-8978 <a href="mailto:yolanda_wright216@yahoo.com">yolanda_wright216@yahoo.com</a> <b>CHAIRPERSON</b> Community Representative</p>		
<p>Jonathan Negron 874 S.W. Commonwealth Road Port St. Lucie, FL 34953 (772) 924-7077 <a href="mailto:meeqan_fofani@yahoo.com">meeqan_fofani@yahoo.com</a></p> <p><b>Child Development &amp; Family Services</b></p>	<p>Duliana Edmond 1201 N. 31<sup>st</sup> Street Fort Pierce, FL 34947 (772) 410-9411 <a href="mailto:duliedmond@yahoo.com">duliedmond@yahoo.com</a></p> <p><b>Garden Terrace Head Start</b></p>	<p>Curlinda Sams 2002 N. 31<sup>st</sup> Street Fort Pierce, FL 34947 (772) 501-2017 / (772) 882-4741 <a href="mailto:coachcurlinda@gmail.com">coachcurlinda@gmail.com</a> <b>VICE-CHAIRPERSON</b> George W. Truitt Family Services</p>	<p>Ramon Olivo 2905 Avenue D Fort Pierce, FL 34947 (772) 634-1465 <a href="mailto:shymusicbaby.sp@gmail.com">shymusicbaby.sp@gmail.com</a> <b>PC BOARD REPRESENTATIVE</b> Queen Townsend HS Center II</p>	<p>Kevin Singletary CSC of St. Lucie -Kids at Hope 546 N.W. University Blvd. Suite 204 Port St. Lucie, FL 34986 (772) 871-5880 <a href="mailto:ksingletary@roundtablesfc.org">ksingletary@roundtablesfc.org</a> <b>Community Representative</b></p>		
<p>Fabienne Cemervil 102 S.E. Caprona Avenue Port St. Lucie, FL 34983 (561) 223-5033 / (772) 236-8295 <a href="mailto:cemervilfamily@gmail.com">cemervilfamily@gmail.com</a></p> <p><b>Child Development &amp; Family Services</b></p>	<p>Jay Matthew Bettcher 7105 Palomar Parkway Unit C Fort Pierce, FL 34951 (904) 517-7523 <a href="mailto:akinard673@gmail.com">akinard673@gmail.com</a></p> <p><b>Lincoln Park Head Start</b></p>	<p>Michelle Lee Marcial 1390 Otto Polk Road Frostproof, FL 33834 (863) 232-8930 <a href="mailto:michelle.marcial60@gmail.com">michelle.marcial60@gmail.com</a></p> <p><b>Frostproof Child Development</b></p>	<p>Adevion Mathis 2224 N. 53rd Street Fort Pierce, FL 34946 (478) 320-5666 <a href="mailto:Adevionmathis@yahoo.com">Adevionmathis@yahoo.com</a></p> <p><b>Queen Townsend HS Center II</b></p>	<p>Linda Halpin DCF District 19 - Licensing Supervisor 337 North U.S. Hwy 1, Benton Bldg. Fort Pierce, FL 34950 (772) 467-4184 <a href="mailto:Linda.Halpin@myffamilies.com">Linda.Halpin@myffamilies.com</a> <b>Community Representative</b></p>		
<p>Dr. Anna White, DPT Doctor of Physical Therapy 519 S.W. Nagle Place, Port St. Lucie, FL 34953 (772) 209-1183 <a href="mailto:annaw305@gmail.com">annaw305@gmail.com</a></p> <p><b>Community Representative</b></p>	<p><b>TBA Board Member</b></p> <p><b>Community Representative</b></p>	<p><b>TBA</b></p> <p><b>Learning Tree Academy</b></p>	<p><b>Policy Council Membership =18</b></p>			
<b>ALTERNATES</b>						
<p>Dayna White 1433 S.E. North Ballcourt Court Port St. Lucie, FL 34952 (850) 354-9147 <a href="mailto:daynaselena1122@aol.com">daynaselena1122@aol.com</a></p> <p><b>Child Development &amp; Family Services</b></p>	<p>Cassandra Torres 358 N.W. Curtis Street Port St. Lucie, FL 34983 (772)834-5105 <a href="mailto:Cassy0062@gmail.com">Cassy0062@gmail.com</a></p> <p><b>Child Development &amp; Family Services</b></p>	<p>Raquel Bizzell 1017 Chipola Road Apt. A Fort Pierce, FL 34950 (561)945-2425 <a href="mailto:Raquel.Bizzell@gmail.com">Raquel.Bizzell@gmail.com</a></p> <p><b>Francina Duval Head Start</b></p>	<p>Glorious Sullivan 3300 Avenue R Fort Peirce, FL 34950 (863)801-8349 <a href="mailto:mssulli7@gmail.com">mssulli7@gmail.com</a></p> <p><b>George W. Truitt Family Services</b></p>	<p>Kayla Walker 1701Woodward Drive Fort Pierce, FL 34946 (772) 501-9501</p> <p><b>Queen Townsend HS Center II</b></p>	<p>Yasmine L. Hamilton 311 Stanley Avenue Frostproof, FL 33843 (863)241-2345 <a href="mailto:Godsgift23@icloud.com">Godsgift23@icloud.com</a></p> <p><b>Frostproof Child Development</b></p>	<p>Nicole Jones 2838 Stoneway Lane Apt. A Fort Pierce, FL 34982 (772)985-6089 <a href="mailto:Nicolekay94@outlook.com">Nicolekay94@outlook.com</a></p> <p><b>Lincoln Park Head Start</b></p>
<p>Destiny Debrosse 61990 N.W. Regent Street Port St. Lucie, FL 34983 (770) 354-9147 <a href="mailto:destiny.debrosse@yahoo.com">destiny.debrosse@yahoo.com</a></p> <p><b>Child Development &amp; Family Services</b></p>	<p>Jeremiah Turner 358 N.W. Curtis Street Port St. Lucie, FL 34983 (772)924-6825 <a href="mailto:Jeremiahturne13@gmail.com">Jeremiahturne13@gmail.com</a></p> <p><b>Child Development &amp; Family Services</b></p>	<p>Brandii Walker 1655 N. 29th Street Apt. 207 Fort Pierce, FL 34947 (772) 672-0465 <a href="mailto:brandiiw@yahoo.com">brandiiw@yahoo.com</a></p> <p><b>Garden Terrace Head Start</b></p>	<p>Islande Chery 1124 Grand Club Blvd. Fort Pierce, FL 34982 (772) 940-7773 <a href="mailto:awosomeizzy@lize.com">awosomeizzy@lize.com</a></p> <p><b>George W. Truitt Family Services</b></p>	<p>Precious Wilson 124 Alma Court Fort Pierce, FL 34950 (772)201-7802 <a href="mailto:preciouswilson445@gmail.com">preciouswilson445@gmail.com</a></p> <p><b>Queen Townsend HS Center II</b></p>	<p>Shaniqua Culver 5010 Lasell St. Fort Pierce, FL 34951 (772) 971-0290</p> <p><b>Queen Townsend HS Center II</b></p>	<p><b>TBA</b></p> <p><b>Learning Tree academy</b></p>



**CENTRAL REGION ADVISORY COUNCIL  
MEMBERSHIP ROSTER  
2021-2022**

**Vacant (Chairperson)**  
**Term: 2021-2024**

**Dorothy Spencer**  
602 N Brunnell Pkwy  
Lakeland, FL 33815  
Hm: 863/688-1906  
jerihaynes@aol.com  
**Term: 2021-2024**

**Josephine Howard**  
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jolizhow13@yahoo.com  
**Term: 2019-2022**

**Margaree B. Simon, Treasurer**  
**1030 West Tee Circle**  
**Bartow, Florida 33830**  
**Term: 2021-2024**

**VACANT**  
**Term: 2021-2024**

**Jennie Calhoun**  
106 E. Pine Street  
Davenport, FL 33837  
Hm: 863/422-0677  
Cell: 83/557-1526  
calhounj.63@gmail.com  
**Term: 2019-2022**

**Beulah Jones (Mail)**  
3111 Woodhill Road  
Winter Haven, FL 33881  
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Bjones59@netzero.net  
**Term: 2019-2022**

**Earnestine Davis (Mail)**  
3079 Buckeye Point Drive  
Winter Haven, FL 33881  
Hm: 863/268-6011  
ErnestineDavis1940@yahoo.com  
**Term: 2019-2022**

**Clora Dubose (Mail)**  
315 Avenue P, N.E.  
Winter Haven, FL 33881  
Hm: 863/294-4630  
**Term: 2020-2023**

**VACANT**  
**Term: 2020-2023**

**Annie Larkins, Secretary**  
P.O. Box 4044  
Winter Haven, FL 33885  
Hm: 863/294-1493  
annielarkins44@verizon.net  
**Term: 2020- 2023**

**Johnnie McNair, Vice Chair**  
2872 Barton Place  
Bartow, FL 33850  
Hm: 863/533-8230  
Cell: 863/860-6151  
jsugarmac1@hotmail.com  
**Term: 2020 - 2023**

**Vacant**  
**Term: 2021-2024**

**Jacqueline Rentz**  
1004 Wildwood East  
Lakeland, FL 33801  
Hm: 863/665-3131  
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**Term: 2021-2024**

**Marian Owens (Mail)**  
2418 Lucerne Park Road, NE  
Winter Haven, FL 33881  
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**Term: 2021-2024**

**VACANT**  
**Term: 2021-2024**

**Ruby Willix\*\*(Call)**  
2876 Dudley Drive  
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Hm: 863/537-6292  
Cell: 863/207-1822  
rubywillix@comcast.net  
**Term: 2021-2024**

**Patricia Salary**  
2301 S. Swan Court, NE  
Winter Haven, FL 33881  
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**Term: 2020-2023**

**Mary Shepherd**  
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Davenport, FL 33836  
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maryshepherd1948@gmail.com  
**Term: 2020-2023**

**Dartha Shular**  
125 Fleming Lane  
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**Term: 2019-2022**

**Vermell Brown**  
305 Avenue X, NE  
Winter Haven, FL 33881  
Hm: 863/293-6513  
Cell: 863/221-7458  
vermellbrown35@gmail.com  
**Term: 2019-2022**

**VACANT**  
**Term: 2019-2022**

**Vacant**  
**Term: 2020-2023**

**\*\* 1/2021-1/2022 Board Rep.**  
**Eff. 10/2020**



EASTERN REGION ADVISORY COUNCIL  
MEMBERSHIP ROSTER

2021-2022

Revised 10/07/21

**\*\*William Holt**, Chairperson  
4129 57<sup>th</sup> Avenue  
Vero Beach, FL 32967  
Home: 772-562-8377  
Cell: 772-538-4280  
[1946holt@gmail.com](mailto:1946holt@gmail.com)  
Term: 2019-2022

**Constance Griffin**, Vice Chairperson  
3500 Avenue S  
Fort Pierce, FL 34947  
Cell: 772-882-1552  
[cvgriffin62@gmail.com](mailto:cvgriffin62@gmail.com)  
Term: 2020-2023

**Gena Spivey**, Treasurer  
2310 SE Shelter Drive  
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Home: 772-398-0656  
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Term: 2018-2021

**Marjorie Gaskin**, Secretary  
1511 N 21<sup>st</sup> Street  
Fort Pierce, FL 34950  
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[mbgaskin2@gmail.com](mailto:mbgaskin2@gmail.com)  
Term: 2018-2021

**Frances Cooper**  
2606 Atlantic Avenue  
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Term 2019-2022

**Debra Williams**  
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Term 2019-2022

**Victoria Frazier**  
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Term: 2019-2022

**Angela Jules**  
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Term 2018-2021

**Sonya Allen-Baylor**  
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Term: 2019-2022

**Bobby Byrd**, Parliamentarian  
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Term: 2020-2023

**Clarence Brown**  
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Term: 2019-2022

**Tiffany Wilder**  
318 N 13<sup>th</sup> St  
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Term: 2019-2022

**Beverly Richardson**  
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Term: 2019-2022

**Betty Bradwell**  
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Term: 2018-2021

**Mercadez Estime-Connelly**  
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Term: 2020-2023



**NORTHERN REGION/ATEC ADVISORY COUNCIL  
2020-2021 MEMBERSHIP ROSTER**

**DONALD TILLMAN, CHAIRPERSON**

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Groveland, FL 34736  
Work: (407)905-6427  
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donaldtillman@ymail.com  
**Term: 2018-2021**

**CONSTANCE ANDERSON, SECRETARY**

2480 Crawford Drive  
Sanford, FL 32771  
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constanceanderson1951@gmail.com  
**Term: 2018-2021**

**CHARLES HARRIS, JR.**

6607 Old Hwy 441 South  
Mt. Dora, FL 32757  
Home: (352) 383-5867  
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charrisjr1@hotmail.com  
**Term: 2019-2022**

**\*\*\*SHELIA DIXON, ASST. SECRETARY**

3651 Ronda Dr.  
Deltona, FL 32738  
Cell: (407) 314-1067  
dixons@ret.seminolestate.edu  
**Term: 2020-2023**

**\*DAVID RUCKER, VICE CHAIR**

4557 Frisco Circle  
Orlando, FL 32808  
Home: (407) 299-7672  
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freedman7@bellsouth.net  
**Term: 2018-2021**

**JOSEPH WASHINGTON, JR.**

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Apopka, FL 34787  
Cell: (407) 922-5076  
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**Term: 2019-2022**

**NEREIDA JACKSON, PARL.**

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nettiejcksn@gmail.com  
**Term: 2018-2021**

**\*\*EVELYN SEABROOK, TREASURER**

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Eustis, FL 32726  
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Brooklyn\_Seav48@hotmail.com  
**Term: 2019-2022**

**CHESTER MCNORTON**

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chesterbmcnorton@yahoo.com  
**Term: 2018-2021**

**MAUREEN LEWIS**

586 Smokemont Ct.  
Apopka, FL 32712  
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**Term: 2018-2021**

**ANNETTE BROWN**

1303 Ridgefield Avenue  
Ocoee, FL 34761  
Cell: (772) 216-3201  
msbrown3115@yahoo.com  
**Term: 2020-2023**

**VACANT**

**Term: 2018-2021**

**VACANT**

**Term: 2018-2021**

**VACANT**

**Term: 2019-2022**

**\*Board Rep/(2020-2023)  
\*\*Special Events Chair  
\*\*\*Scholarship Chair**

(October 2020)



## The Agricultural and Labor Program, Inc. 2022 Southern Region Advisory Council Membership Roster

**Kimberly R. Ross, Chair**

P. O. Box 1214  
Clewiston, FL 33440  
(863) 233-6500  
E-Mail: [kim.ross863@gmail.com](mailto:kim.ross863@gmail.com)  
Term: 2021-2024

**\*\*Annie Robinson, Secretary**

748 Hunt Street  
Lake Wales, FL 33853  
(863) 676-4008 Home  
(863) 232-8899 Cell  
E-Mail: [annrobinson1226@yahoo.com](mailto:annrobinson1226@yahoo.com)  
Term: 2021-2024

**Noemi Cruz, Treasurer**

P. O. Box 292  
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Term: 2020-2023

**VACANT**

Term: 2020 -- 2023

Term: 2020 – 2023

Term: 2020 -- 2023

Term: 2020-2023

Term: 2020-2023

**VACANT**

Term: 2019 – 2022

Term: 2019 – 2022

Term: 2019-2022

Term: 2019-2022

Term: 2019-2022

**BYLAWS  
OF  
THE AGRICULTURAL AND LABOR PROGRAM, INCORPORATED**

**ARTICLE I - SCOPE**

- Section 1** The name of this organization shall be **The Agricultural and Labor Program, Incorporated**. It shall also be known by its acronym: **ALPI**.
- Section 2** The Agricultural and Labor Program, Incorporated shall be incorporated under the laws of the State of Florida as a non-profit, tax exempt organization.
- Section 3** The Agricultural and Labor Program, Incorporated's Fiscal Year shall be from July 1 through June 30 of each year.

**ARTICLE II - PURPOSE**

- Section 1** The specific purpose for which this Corporation is formed is to assist agricultural workers, disadvantaged, disenfranchised persons and other interested members of the community and their family members in cooperatively meeting their needs for better health, education, social services, home life, economic opportunities and human relations. In furtherance of this purpose, the Corporation shall have all powers conferred by Chapter 617 of the Florida Statutes, including but not limited to the following powers: to provide research for the foregoing purposes; to provide advisory service to disadvantaged agricultural workers and disenfranchised people; to provide leadership training for those involved in service to agricultural workers disadvantaged and disenfranchised people; to develop projects and to aid and assist their furtherance; to provide and assist in the obtaining of suitable housing; to provide funds whenever possible for training and assisting targeted groups; to assist social service programs; to participate in, to the fullest extent practicable, all governmental programs as passed by the Congress of the United States of America; to acquire funds from any source for all of the foregoing purposes, such as foundations, state and federal agencies, corporations, but not limited to, in support of the foregoing purposes, and to expand the same with the full discretion of the Board of Directors and Executive Committee as created hereinafter on a non-profit basis; to create an Advisory Council in each of the four regions currently in operation, Southern, Eastern, Central and Northern, to ensure appropriate representation of the low-income community from CAA designated areas and to continue same in any new region that may be created for the purpose of aid and counsel to the Board of Directors; to participate in such charitable and philanthropic projects and activities as shall from time to time be feasible, and to do any and all manner of things as may be necessary to carry out the above activities in the State of Florida and such other states as the Board of Directors may determine.
- Section 2** In order to promote the purposes of this Corporation, it may acquire property by grant, gift, purchase, devise or bequest, and hold, mortgage and dispose of such property as the Corporation shall require for the benefit of the members and not for pecuniary profit.
- Section 3** The Agricultural and Labor Program, Incorporated may provide community, social and related services in any location approved by the Board of Directors and allowed by Law. Additionally, it shall serve as the Community Action Agency (CAA) for Polk, Highlands, Hendry and Glades Counties.

**Section 4** To do any and all other things necessary or proper to the achievement of any or all of the above purposes and to do any and all things permitted by non-profit organizations under and by virtue of the laws of the State of Florida.

**Section 5** The foregoing provisos of this Article are to be construed as both objects and powers, and it is expressly provided that said objects and powers shall in no sense be limited by any other proviso of these Amended Articles of Incorporation, but shall be regarded as independent objects and powers, provided, however, that nothing herein contained shall be construed as authority to carry on business or exercise any power or undertake any act which may be inconsistent with Chapter 617 of the Florida Statutes, the CSBG ACT or in any way inconsistent with Section 501(c)(3) of the Internal Revenue Code of 1954.

### **ARTICLE III - DUTIES OF THE BOARD**

**Section 1** The affairs of the Corporation shall be administered by a Board of Directors elected by the Corporation as outlined in these Bylaws. The Board shall have the responsibility of seeing that the purposes outlined in these Bylaws are achieved.

The Board is authorized and empowered to delegate and assign the task of administering and implementing its duties to an Executive Committee, whose actions and activities shall be at all times subject to limitation and direction by the Board of Directors.

**Section 2** The Board shall be responsible for employing a Chief Executive Officer who shall lead the agency and its staff in pursuit of the objectives established by the Board in the agency's strategic plan and annual operating plan and shall be responsible for the supervision of all agents and employees of the Corporation. Additionally, the Chief Executive Officer shall be responsible for the day to day operation and administration of the Corporation subject to limitations and restrictions imposed by the Board of Directors.

**Section 3** The Board shall have fiduciary responsibility for all assets of the Corporation. Expenditures and disbursements of corporate funds may be made upon such terms as established by the Board.

**Section 4** The Corporation shall indemnify the members of the Board for all acts taken in good faith, within the scope of the Board's responsibility, and on behalf of the Corporation.

**Section 5** The Board shall be responsible for ensuring that the activities carried out under its direction are in conformity with its Bylaws and Articles of Incorporation and that its tax exempt, non- profit status is maintained.

## ARTICLE IV - COMPOSITION OF THE BOARD

### **Section 1**

The Board shall consist of not less than nine (9) nor more than twenty-four (24) voting members. Total Board membership, in accordance with the CSBG Tripartite Requirement, shall be equally divisible by three (3) at all times. All Board members eligible to vote shall be identified by one of three designations. These are: (1.) Elected public officials; (2.) Low- income community representatives; and, (3.) Local business/other representatives.

#### **a. Tripartite Requirements:**

- (1) Elected Public Officials** – One third (1/3) of all voting members shall be comprised of elected public officials selected by the ALPI Board of Directors. Of these members, at least one (1) each shall be from Polk, Highlands, Hendry, and Glades Counties. The remaining elected public officials shall be selected by the ALPI Board of Directors from counties wherein ALPI provides services and may include, but is not limited to, Polk, Highlands, Hendry, and Glades Counties. Upon a finding, as documented and recorded in the ALPI Board minutes, that no elected public official is willing to serve, the ALPI Board of Directors shall select an appointed public official for membership. The term of membership of any elected and/or appointed public official on the ALPI Board of Directors shall be two (2) years and may, at the sole option of the Board of Directors, be renewed in two (2) year terms thereafter. Said membership may be terminated in accordance with these Bylaws and the Articles of Incorporation of ALPI. All public officials may appoint a representative to serve in their place by providing a letter of such appointment to the ALPI Board of Directors and, annually thereafter, providing a letter reaffirming said appointment. If the appointed representative terminates from the Board for any reason, the public official shall resume her/his membership on the Board or may appoint a new representative for the balance of the term. In any case, an appointed representative may not serve on the Board for any time beyond the public official's membership. Regardless of the term of membership, any public official's membership (elected or appointed) on the Board of Directors shall end upon termination of their public position.
- (2) Low-income Community Representatives** - No fewer than one-third (1/3) of all voting members shall be comprised of individuals representing the low-income communities wherein ALPI provides services. These individuals shall be elected through the Regional Advisory Council election process as outlined in these Bylaws. A minimum of one (1) member shall be elected from Polk, Highlands, Hendry, and Glades Counties by the appropriate Regional Advisory Council. If no members are elected, an identified County, the Board of Directors will appoint a member from each County based on the recommendations of local community leaders and organizations.
- (3) Local Business/Other Representatives** - The remainder of the members of the Board of Directors shall be officials or members of business, industry, labor, religious, welfare, education, or other major groups and interests in the community. These members will be appointed by the Board of Directors in accordance with the ALPI Bylaws and Articles of Incorporation. A minimum of one (1) member each shall be from Polk, Highlands, Hendry, and Glades Counties.

#### **b. Petitioning Procedures:**

- (1) Any community organization, religious organization or representative group of the low-income community of Polk or Highlands Counties that believes its members to be inadequately represented on the Board may petition for adequate representation as follows:

- (2) The petition must be signed by fifty (50) members of the petitioning group or fifty percent (50%) of the bona fide members of that group or organization. These names shall be residents of the area, at least eighteen (18) years of age, and each person's residential address must be listed adjacent to his/her name.
- (3) Upon receipt of an acceptable petition, the organization or group shall be afforded a timely, informal and open hearing before the Board of Directors in order to have a full and fair opportunity to present their request for action to the Board.
- (4) If a petitioning group is granted a seat on the Board pursuant to such a hearing, that representative shall be properly seated at the next regularly scheduled Board meeting and afforded all rights and privileges of any other voting member of the Board. The membership of the Board will be adjusted and realigned, as necessary, to accommodate the increased membership and to maintain the proper ratio among elected officials; low-income community representatives; and, local business/other representatives.
- (5) A written statement of the Board's action on all petitions shall be submitted to the petitioning group and a copy of that statement shall be sent to the State of Florida, Department of Community Affairs or its duly authorized successor.

**Section 2** All Board members will be those persons who subscribed to the purposes of this Corporation and who shall have been elected or appointed to membership in accordance with these Bylaws. The membership of this Corporation shall include representatives of all groups as required by any guidelines or regulations of the federal, state, or local governments or by organizations from the private sector.

**Section 3** No member of a Board Member's immediate family shall serve as a Board Member during the same time as that Board Member. Immediate family is defined as follows: Husband, Wife, Mother, Daughter, Son, Father, Father-in-Law, Mother-in Law, Sister, Sister-in-Law, Brother, Brother-in-Law, Grandmother, Grandfather, Aunt, Uncle, Niece, and Nephew.

**Section 4** No employee of the agency may serve on the Board of Directors. Former employees must be out of service for at least three (3) years before becoming eligible to serve on the Board of Directors.

**Section 5** At the Annual Meeting of the Regional Advisory Councils, those in attendance who have been validated to vote, shall elect a minimum of one low-income represent to serve on the Board of the Directors of the Corporation. Additionally, a minimum of one (1) representative shall be elected by the appropriated regional advisory council to represent the CSBG targeted communities including but not limited to Polk, Highlands, Glades and Hendry Counties. Each elected representative must have been an active member of the Regional Advisory Councils for at least two (2) years preceding her/his terms of office.

Each Board member, elected or appointed, shall serve a two year term on the Corporation's Board of Directors. Elections and appointments shall be made to allow for staggered two-year terms.

**Section 6** The Board of Directors shall have the authority to appoint all members, except for the low- income community representatives who shall be elected by the Regional Advisory Council(s) provided, however, one member will be a representative of the Head Start Policy Council and one (1)

member will be a representative of ATEC. The Head Start Policy Council member shall be designated as a low-income community representative and the ATEC Representative shall be designated as a local business/other representative

The Board of Directors may fill appointed member vacancies at any time; however, in order to fully comply with CSBG requirements, the Board may appoint all necessary members prior to October 1, 2007. Said appointments will include a designation as to the initial length of office for each appointment and identification of each member's representative group.

**Section 7** Members of the Board of Directors may succeed themselves.

**Section 8** The Board may, at its discretion, declare the office of a member of the Board vacant in the event such member shall be absent from two (2) consecutive regular Board Meetings and/or three (3) excused or unexcused absences in one year. Board Members must attend two (2) of three (3) Board Orientation/Training sessions offered annually to remain as a member of the Board. Orientation/training sessions will include the Shared Governance Orientation, Board Retreat, and one additional professional development training.

A Board Member must provide written notification, to the Secretary of the Board, after the second absence and said absence(s) are excused by the Board. Said notification must be submitted no later than seventy-two (72) hours prior to the scheduled Board meeting, with the exception of emergencies. If the member is unable to provide the requisite notice, the Chairman of the Board will have the authority to make the determination as to whether the absence is excused. The CEO will notify the Board Member, by letter of this impending action after the second absence.

**Section 9** Any Board Member may be removed by a two-thirds vote of the Board, for cause, at any regular meeting thereof, provided the Board member is informed of the basis of the complaint against her/him in writing, at least seven days prior to the meeting and is given an opportunity at the meeting to respond to the allegations, prior to the Board's vote. Once removed, a member cannot be appointed or elected to the Board for a period of three (3) years from the date of removal.

**Section 10** In the event of death, resignation or removal of any Board, her/his successor shall be replaced in accordance with these Bylaws and said new member shall then serve for the unexpired term of her/his predecessor.

**Section 11** Committee Chairpersons shall be a Board Member and shall be selected by the Chairperson of the Board. Each committee shall have no less than three (3) members including its Chairperson.

**Section 12** Grace Miller is hereby designated as Board Member Emeritus and shall serve as a non-voting member of the Board of Directors.

**Section 13** Allowances and Reimbursements: No Board Member shall receive any compensation for any service that she/he may render as a Board Member. Members may be reimbursed for her/his actual expenses, including babysitting, travel, etc., incurred in the performance of her/his duties at the option of the Board.

## **ARTICLE V - MEETING OF THE BOARD**

- Section 1** Regular meetings of the Board shall be held not less than four (4) times annually, inclusive of the annual meeting, at such place, date and hours as may be fixed by the Board. Notice of all Board meetings shall be provided to the public, not less than fifteen (15) days prior to such meeting, through press releases and/or phone calls to the wire services and other media, including local or regional newspapers. Any such notice will contain the time and place of the meeting and, if available, an agenda. If no agenda is available, the notice will include a summation of the subject matter of the meeting. Additionally, the notice will be prominently displayed in the area of the agency's offices set aside for that purpose.
- Section 2** All Board Meetings shall be open to the public unless exempt from Section 286.011, Fla. Stat.
- Section 3** Special or emergency meetings of the Board shall be held when called by the Chairperson of the Board, or by any three (3) Board Members. Notice of all such meetings shall be provided in accordance with Article V, Section 1 of these Bylaws except that said notice will be provided not less than twenty-four (24) hours prior to such meeting.
- Section 4** A quorum of the Board of Directors shall consist of at least one-half plus one of the then seated membership. The vote of a majority of the votes entitled to be cast by the members present at a meeting, at which a quorum is present, is necessary for the adoption of any matter voted on by the members, unless a greater proportion is requirement by law, the Articles of Incorporation or any provision of these Bylaws.
- Section 5** The Board may, from time to time, create Committees which may be standing or ad hoc. The Chairperson of a Committee shall be appointed by the Board Chairperson, with the consent of the Board of Directors. Non-Board members may be selected to serve on Board Committees, but may not serve as chairpersons. No Board member may assign his/her voting responsibilities. Proxy votes of Board members shall not be allowed.
- Section 6** All minutes of Board meetings will be transcribed and provided to the Board of Directors prior to any subsequent Board meeting. Upon request, the minutes shall be made available to the public.
- Section 7** Board members may participate in a meeting of the Board of Directors or any Committee thereof by means of a conference telephone (teleconferencing) or any other communication equipment or device that allows all persons participating in the meeting to hear each other at the same time. Participation by such means shall constitute presence in person at said meeting and shall not be deemed to be "vote by proxy".
- Section 8** In the event a meeting cannot convene to approve a required action, Board members may vote, by e-mail, on said issue (s).
- Section 9** All meetings shall be conducted in accordance with the most recent edition of "Roberts' Rules of Order.

## ARTICLE VI - BOOKS AND RECORDS

The Articles of Incorporation, Bylaws of the Board, and the books, records, and papers of the Board shall at all times, upon reasonable request, during working hours, be subject to inspection by any member of the Corporation, the public, or any other organization or governmental entity.

## ARTICLE VII - OFFICERS AND THEIR DUTIES

**Section 1** The Officers of the Board shall be Chairperson, Vice-Chairperson, Secretary, and Treasurer, and such other officers as the Board may by resolution create.

**Section 2** The election of officers shall take place following the annual meeting of the Corporation, or as soon thereafter as reasonably possible.

**Section 3** The officers of this Board shall be elected every two (2) years by the Board and each shall hold office for two (2) years unless she/he resigns, is removed or is otherwise disqualified to serve. Officers may be elected to succeed themselves. In any event, all officers elected at the corporation annual meeting shall hold office until their successors are elected and qualified.

**Section 4** Any officer may be removed, for cause, by a two-thirds vote of the Board at any regular meeting thereof, provided that written charges against her/him shall first be presented to the Board, and the officer be informed of such charges and be given an opportunity to answer and refute such charges. Any officer may resign, by giving written notice to the Board, the Chairperson or the Secretary. Such resignation shall take effect on the date specified.

**Section 5** A vacancy in any office may be filled by election by a majority of the Board members present at a duly held meeting. The elected officer shall serve for the remainder of the term of the officer she/he replaces.

**Section 6** The duties of the officers are as follows:

- (a) **Chairperson:** The Chairperson shall preside at all meetings of the Board and shall see that orders and resolutions of the Board are carried out. The Chairperson will vote only in case of tie. The Chairperson is authorized to co-sign checks along with the Secretary or Treasurer and shall be bonded for same.
- (b) **Vice Chairperson:** The Vice Chairperson shall act in the absence of the Chairperson and shall exercise and discharge such other duties as may be required of her/him by the Board.
- (c) **Secretary:** The Secretary shall be responsible for seeing that the minutes of all meetings and proceedings of the Board, and of the Annual Corporation Meeting are kept; shall have the authority to co-sign with the Chairperson or Treasurer on all checks of the Board, shall be bonded and shall perform such other duties as required by the Board.

- (d) **Treasurer:** The Treasurer shall have the authority to co-sign with the Chairperson or Secretary all checks of the Board. Facsimile signatures shall be authorized in accordance with the Corporation's "Fiscal Management Policies and Procedures Manual." The Treasurer shall be bonded; insure an annual audit of the Board books is made by a public accountant at the completion of each fiscal year and at such other times as requested; and shall assist in an annual budget and a statement of income and expenditures to be presented to those in attendance at the meeting of the Board not less than four (4) times a year and at the Annual Meeting.

**Section 7** Code of Ethics – All Board members shall comply with the Corporation's current "Code of Business Conduct" outlined in the most recent copy of the Corporation's "Board Policies and Procedures Manual" as well as the "Code of Conduct" outlined in the most recent copy of ALPI's "Fiscal Management Policies and Procedures Manual". This includes, but is not limited to, acceptance of gifts, payments, etc. At a minimum, each Board member shall sign a copy of the "Code of Business Conduct" prior to Board appointment.

**Section 8** Conflict of Interest – In order to assure fair and unbiased business transactions, all Board members shall comply with the "Code of Business Conduct" provision contained in the Board "Policies and Procedures Manual and ALPI "Fiscal Management Policies and Procedures Manual.

#### **ARTICLE VIII**

#### **ANNUAL MEETINGS OF THE CORPORATION**

**Section 1** In January of each year, an Annual Meeting of the Corporation members will be held for the purpose of reporting the Board's activities to the corporate membership; issuing a corporate financial report; installing Board members; and, conducting such other business as may be necessary to fulfill the organization's mission.

**Section 2** Notification of the meeting will be provided to interested members of the community residing in the area represented by the Corporation and to the corporate membership with notice of the meetings to be in accordance with Article V of these Bylaws.

**Section 3** All Corporation members who have attained their majority, who qualify under Article III of the Articles of Incorporation of this organization, and who have been members at least ninety (90) days, who are in attendance at the meeting, shall be entitled to vote on the business affairs of the Corporation as specified in the Articles of Incorporation and the Bylaws.

#### **ARTICLE IX - EXECUTIVE COMMITTEE**

**Section 1** The Executive Committee shall consist of the Chairperson, Vice-Chairperson, Treasurer, Secretary, Assistant Secretary and one (1) Board member that is recommended by the Chairperson and who is approved by the Board.

**Section 2** The Executive Committee will be responsible for conducting the business of the Board when the Board is not in session and shall meet on a regular basis to facilitate and transact the business of the organization provided all such meetings shall comply with the notice requirements of Article V of these Bylaws.

- Section 3** The Executive Committee shall not have the non-emergency authority to:
- a. remove an officer or director;
  - b. dispose of corporate assets valued in excess of \$100,000;
  - c. approve the corporate annual budget; or
  - d. remove, hire or discipline the Chief Executive Officer.

**ARTICLE X - REGIONAL ADVISORY COUNCIL**

- Section 1** The Corporation membership shall be divided into four (4) regions: Southern, Eastern, Central, and Northern, with each region having a Regional Advisory Council. The regions shall be designated by the Board of Directors.
- Section 2** Regional Advisory Councils shall serve in an advisory capacity to the Board of Directors.
- Section 3** The Regional Advisory Council shall have a membership of not less than nine (9) nor more than twenty-four (24).
- Section 4** No employee of the agency may serve on any Regional Advisory Council. Former employees must be out of service for at least one (1) year before becoming eligible to serve on any Regional Advisory Council.
- Section 5** No member of a Council Member's immediate family shall serve as a Council Member of the same Regional Advisory Council during the same time as that Council Member. Immediate family is defined as follows: Husband, Wife, Mother, Daughter, Son, Father, Father-in-Law, Mother-in Law, Sister, Sister-in-Law, Brother, Brother-in-Law, Grandmother, Grandfather, Aunt, Uncle, Niece, and Nephew.
- Section 6** There shall be an annual meeting of the corporate membership in each of the four (4) previously identified regions. Said meeting will be held each year before the end of November. At each annual Regional Advisory Council meeting up to eight (8) persons shall be elected for three-year terms. It is the intent of this provision to continue to provide for staggered three-year terms with a total up to twenty-four (24) members for each Regional Advisory Council. Those in attendance and who are entitled to vote shall elect eligible members to fill all vacant/new positions. All members shall be democratically elected as specified in the bylaws and the Board of Directors approved Regional Geographic Target Areas.
- Once sworn-in as Regional Advisory Council members, they shall immediately elect their officers and their representatives to the Board of Directors. All Regional Advisory Council members elected to the Board of Directors shall be representatives of the low-income geographic target areas of said region. Regional Advisory Council officers may be elected as a low-income community representative if appropriate.
- Section 7** If requested by the Board of Directors, the Regional Advisory Council shall recommend elected officials and local business/other representatives for consideration for appointment to the voting membership of the Board. The Board of Directors shall have the sole responsibility for making appointments of elected officials and local business/other representatives,
- Section 8** All other designated subsidiaries and affiliates of ALPI shall fully comply with and adhere to these Bylaws as well as all applicable Policies and Procedures.

## **ARTICLE XI RETIREMENT COMMITTEE**

- Section 1** The Retirement Committee shall serve as the Retirement Plan Administrator of the organization's retirement plan.
- Section 2** The Retirement Committee shall consist of the Executive Committee of the Board of Directors.
- Section 3** Except as to those functions specifically reserved within the Retirement Plan to the Board of Directors and ALPI, the Retirement Committee shall control and manage the operation and administration of the Retirement Plan.
- Section 4** A majority of the members of the committee at the time in office shall constitute a quorum for the transaction of business at any meeting. Notice of all meetings shall be given in accordance with Article V of these Bylaws. Any determination or action of the committee may be made or taken by a majority of the members present at any meeting thereof, or without a meeting by a resolution or written memorandum concurred in by a majority of the members then in office. No member who is a participant of this plan, however, shall vote on any question relating solely to himself.
- Section 5** The Retirement Committee, subject to the limitations contained in the Retirement Plan and to such other restrictions as the Board of Directors may make, shall have the power and the duty to carry out the provisions of the Retirement Committee as to any question involving the general administration and interpretation of the Plan shall be final, conclusive and binding. Any discretionary actions to be taken by the committee by respect to the classification of the employees, participants, beneficiaries, contributions, or benefits shall be uniform in their nature and applicable to all persons similarly situated.
- Section 6** The Retirement Committee may employ counsel, a qualified public accountant, a qualified actuary, a consultant and such clerical, medical and other accounting services as it may require in carrying out the provisions of the Plan or in complying with requirements imposed by ERISA and the Internal Revenue Code.

## **ARTICLE XII – DISSOLUTION OF CORPORATION**

Upon the liquidation, dissolution, or winding up of the corporation, whether voluntarily or involuntarily, the assets of the Corporation shall be distributed in the following manner:

- (A) All debts and liabilities of the Corporation shall be paid based on the availability of funds.
- (B) Property purchased with contractual funds will be disposed or in compliance with contractual guidelines.
- (C) If assets remain, any audited fund balances due to any governmental agency shall be returned to said agency or agencies.
- (D) Any and all assets remaining shall be distributed to those charitable, scientific, religious, and educational organizations qualifying as a tax-exempt organization in accordance with the Internal Revenue Code and as determined eligible by the Board of Directors.
- (E) No assets of the Corporation shall inure to the benefit of any officer, director, or individual of the Corporation upon dissolution.

**ARTICLE XIII - AMENDMENTS**

**Section 1** These Bylaws may be amended by the Board of Directors at any regular meeting of the organization, after having given at least 21 days written notice of the proposed change to the Board of Directors.

**Section 2** Nothing contained in these Bylaws shall be in conflict with the Articles of Incorporation.

These Bylaws were amended and approved  
By the Board of Directors at  
its' **April 24, 2021 meeting**



William Holt, Board Chairperson

# ALPI BOARD OF DIRECTORS POLICY MANUAL

**SECTION 1**  
Developing Board Policy

**SECTION 2**  
Corporate Structure/Board Organization

**SECTION 3**  
Chief Executive Officer (CEO)

**SECTION 4**  
Meetings

**SECTION 5**  
Organizational Finance

**SECTION 6**  
Employment Policies

**SECTION 7**  
Board Officers

**SECTION 8**  
Committees of the Board

**SECTION 9**  
Facilities

**SECTION 10**  
Model Job Descriptions and Bylaws

## **SECTION I - The Process for Developing The Agricultural and Labor Program, Inc., Board Policy**

The Board, as the ALPI governing body, is entrusted with the authority to establish policy for the governance of ALPI. Board policy establishes the parameters and guidelines for board members, committees, management and staff.

The purposes of our policies are to:

- ▶ inform everyone of board intent, goals and aspirations.
- ▶ prevent confusion among board members, staff and the public.
- ▶ promote consistency of board action.
- ▶ eliminate the need for instant (crisis) policy making.
- ▶ reduce criticism of the board and management.
- ▶ improve public relations.
- ▶ clarify board member, CEO and staff roles.
- ▶ give management a clear direction from the board.

### **MANAGEMENT POLICIES ARE NOT BOARD POLICIES**

The ALPI Board makes an important distinction between board policies and management policies. Board policies establish the broad parameters within which board, management and staff will operate. Management policies, developed and implemented by the CEO, outline the specifics of how the organization and staff will operate within board policy.

Personnel policies are an example of management policy developed by the CEO. The CEO develops the personnel policies appropriate to his/her staff, and has them examined by an attorney familiar with personnel policy. The CEO then informs the board that personnel policies are in place, and provides board members with copies of the personnel policy handbook. The board is not directly involved with developing personnel policies other than to ensure that the CEO has carried out that project.

Once the Board officially adopts a new board policy, that policy is the standard for dealing with the subject matter covered by the policy. If an issue comes before the board that is not in line with existing policy, the issue is out of order and will be considered only in terms of policy change.

### **Policy requires a majority vote of the board**

All policy decisions will be made by majority vote of the board and only at board meetings. Before adopting any policy, all board members will receive a copy of the proposed policy in advance of the meeting at which the vote is to be taken.

### SOURCE OF POLICIES

Policies may be recommended to the board by committees of the board, individual board members or the CEO. All proposed policies will be researched to ensure that they are legal, and do not contradict already established policy or bylaws of ALPI. If approved by the board, policies will be written, coded, dated at time of approval and included in all copies of the board policy manual.

### CONSIDERATIONS FOR ALL POLICIES

All policies proposed to the board should be tested to consider if the proposed policy is:

- ▶ really necessary for good operation of ALPI?
- ▶ consistent with our mission statement?
- ▶ within the scope of board authority?
- ▶ consistent with local, state and federal law?
- ▶ compatible with other policies of this board?
- ▶ practical?
- ▶ broad enough to cover the subject completely?
- ▶ enforceable?

### ACCOUNTABILITY FOR CARRYING OUT ALL POLICIES

The CEO will be accountable to the board for carrying out these policies, ensuring that all policies are effectively explained to the employees and making every reasonable effort to see that they are understood, accepted and complied with.

### DISTRIBUTION OF POLICY MANUAL

A copy of the board policy manual will at all times be available in the ALPI office for review and inspection by employees and board members. Each board member will be given a revised policy manual.

### AMENDMENT OR SUSPENSION OF POLICY

All policies will be annually reviewed by the board or a committee of the board for accuracy and appropriateness, and recommendations will be made to the board for amendment, addition or elimination. Except as otherwise provided by law, any policy of the board may be suspended, repealed, amended, or waived by a majority vote of the board, provided that at least two full weeks advance notice has been given of the intention to consider revocation, repeal, waiver, or amendment.

## **SECTION 2 - Corporate Structure/Board Organization**

ALPI is established as a nonprofit corporation under the laws of the State of Florida. The board of directors is established as the authority to operate ALPI in accordance with bylaws and board policies.

ALPI business will be conducted in accordance with the laws of the State of Florida, the corporation's articles of incorporation, bylaws of the corporation, board policies and generally accepted business practices that will accomplish the ALPI mission.

### **AUTHORITY OF THE BOARD OF DIRECTORS**

Each member of the ALPI Board, together with other members of the board, is legally and morally responsible for all activities of ALPI. All members of the board share in a joint and collective authority which exists and can only be exercised when the group is in session.

### **BOARD MEMBER COMMITMENT**

Serving as a board member of ALPI involves a very special commitment. To meet that commitment, board members are expected to:

- ▶ ensure adherence to ALPI's mission.
- ▶ attend and actively participate in all of the board's meetings, and notify, the executive or board chairperson of anticipated absence.
- ▶ when absent from a meeting, review minutes and results of the missed meeting.
- ▶ do their homework to be prepared to participate fully in board and committee meetings.
- ▶ serve actively on at least one committee.
- ▶ act only with the full board, not individually unless authorized to do so by the full board.
- ▶ speak for the full board only when the full board sanctions their doing so.

### **BOARD DELEGATION OF POLICY INTERPRETATION TO STAFF AND PUBLIC**

The Board delegates to the CEO responsibility for policy interpretation to the staff and public and for rule making, issuance of procedural directives and guides not specifically covered or detailed in the Board Policy Manual. Such interpretations, rules and directives have the force of board regulations unless and until superseded by board action.

### BOARD MEMBERS RIGHTS

Members of the ALPI Board are granted certain specific rights. All board members have the right to:

- ▶ receive notice of board meetings and the agenda.
- ▶ attend and participate in board meetings.
- ▶ examine ALPI's books, records, meeting minutes, financial statements and contracts.
- ▶ place items on the board meeting agenda at the appropriate time.

### BOARD MEMBERS CONFLICT OF INTEREST

Board members have a duty to subordinate personal interests to the welfare of ALPI and those we serve. Conflicting interests can be financial, personal relationships, status or power.

Board members and employees are prohibited from receiving gifts, fees, loans, or favors from suppliers, contractors, consultants, or financial agencies, which obligate or induce the board member or employee to compromise responsibilities to negotiate, inspect or audit, purchase or award contracts, with the best interest of ALPI in mind.

Board members and employees are prohibited from knowingly disclosing information about ALPI to those who do not have a need to know or whose interest may be averse to ALPI, either inside or outside ALPI. Nor may board members or employees in any way use such information to the detriment of ALPI.

Board members or employees may not have a significant financial interest in any property which ALPI purchases, or a direct or indirect interest in a supplier, contractor, consultant or other entity with which ALPI does business.

Since it is not possible to write a policy that covers all potential conflicts, board members and employees are expected to be alert for and avoid situations which might be construed as conflicts of interests.

Any possible conflict of interests on the part of any board member should be disclosed to the other board members and made a matter of record, either through an annual procedure or when the interest becomes a matter of board action.

Any board member having a conflict of interests or possible conflict of interests should not vote or use his/her personal influence on the matter, and he/she should not be counted as part of a quorum for the meeting. The minutes of the meeting should reflect that a disclosure was made, the abstention from voting and the quorum situation.

**Corporate Structure/Board Organization 3**

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These restrictions should not be construed as preventing the board member from briefly stating his/her position in the matter, nor from answering pertinent questions of other board members, since his or her knowledge could be of assistance to the deliberations.

All board members will be required to complete the "Conflict of Interests Statement." This policy will be reviewed by the board annually and given to each new board member for signature during orientation.

**CONFLICT OF INTERESTS STATEMENT**

I have read and am familiar with the ALPI board policy concerning conflict of interests, and I have initialed the line opposite the appropriate paragraph below.

\_\_\_\_ During the past year, neither I, nor to the best of my knowledge, any member of my family has had an interest or taken any action which would contravene the policy of this board.

\_\_\_\_ During the past year, neither I, nor to the best of my knowledge, any member of my family has had an interest or taken any action which would contravene the policy of this board, except such interest or action fully disclosed below:

\_\_\_\_\_

\_\_\_\_\_

- \_\_\_\_\_

- \_\_\_\_\_

- \_\_\_\_\_

- \_\_\_\_\_

- \_\_\_\_\_

- \_\_\_\_\_

Board member signature \_\_\_\_\_

Date \_\_\_\_\_

### DUTY OF BOARD MEMBERS NOT TO COMPETE

A board member may not use his/her position on the ALPI Board to prevent ALPI from competing with the board member's business. It is expected that board members, even after they complete board service, will not use trade secrets, client lists, or other confidential information acquired by virtue of being a member of the board.

### LEGAL OBLIGATIONS OF BOARD MEMBERS

The ALPI board is both responsible and liable for ALPI. The ALPI board and the law require every board member to follow the rule of the reasonably prudent person and the principle of good faith.

The rule of the reasonably prudent person means that the board will not:

- ▶ mismanage ALPI by deviating from fundamental management principles, such as planning carefully for the future of ALPI, regularly reviewing the financial status of ALPI, and monitoring compliance with board policies.
- ▶ fail to govern by utilizing all control systems to govern ALPI.
- ▶ be involved in self-dealing that provides personal gain to board members.

The principle of good faith means that board members will:

- ▶ attend all board and committee meetings to be a part of board actions.
- ▶ read and understand ALPI's policies and bylaws.
- ▶ pay attention to corporate affairs and keep informed about organization activities.
- ▶ ensure that ALPI is in compliance with legal requirements.
- ▶ avoid self-dealing.

### ETHICAL OBLIGATIONS OF BOARD MEMBERS

The board will annually approve a code of ethics for board members. All board members will be given a copy of the code of ethics, and will be expected to adhere to the provisions of that code.

The ALPI Board Code of Ethics:

As a member of the ALPI Board, I will...

- ▶ listen carefully to my teammates, and those served by ALPI.
- ▶ respect the opinion of other board members.
- ▶ respect and support the majority decisions of the board.
- ▶ recognize that all authority is vested in the board when it meets in a legal session and not with individual board members.
- ▶ keep well-informed of developments that are relevant to issues that may come before the board.
- ▶ participate actively in board meetings and actions.
- ▶ call to the attention of the board any issues that I believe will have an adverse effect on ALPI or those we serve.
- ▶ attempt to interpret the needs of constituents to ALPI and interpret the action of ALPI to its constituents.
- ▶ refer constituent or staff complaints to the proper level on the chain of command.
- ▶ recognize that the board member's job is to ensure that ALPI is well managed, not to manage ALPI.
- ▶ vote to hire the best possible person to manage ALPI.
- ▶ represent all constituents of ALPI and not a particular geographic area or special interest groups.
- ▶ consider myself a "trustee" of ALPI and do my best to ensure that ALPI is well maintained, financially secure, growing and always operating in the best interests of constituents.
- ▶ always work to learn more about the board member's job and how to do it better.
- ▶ declare any conflict of interests between my personal life and my position on the ALPI board, and avoid voting on issues that appear to be a conflict of interests.

As a member of the ALPI Board I will not...

- ▶ be critical, in or outside of the board meeting, of other board members or their opinions.
- ▶ use ALPI or any part of ALPI for my personal advantage or the personal advantage of my friends or relatives.
- ▶ discuss the confidential proceedings of the board outside the board meeting.
- ▶ promise prior to a meeting how I will vote on any issue in the meeting.
- ▶ interfere with duties of the executive or undermine the executive's authority.

### ANNUAL MEETING OF THE BOARD

There will be an annual meeting of the board (or general membership) held on January of each year or on such date designated by a vote of the board of directors.

### NOMINATION AND ELECTION OF BOARD MEMBERS

It is the policy of the ALPI Board to carefully nominate and elect to the board persons who:

- ▶ believe in the cause and mission of ALPI.
- ▶ will commit completely to the board member responsibility for ALPI.
- ▶ will participate actively as part of the ALPI Board team.
- ▶ are community leaders and will advocate in the community for ALPI.

The board chairperson will periodically remind board members and the CEO to submit board candidate recommendations to be filed for use at the appropriate nomination time.

Terms of office and election procedures will be as specified in the ALPI bylaws.

### VACANCIES ON THE BOARD

When vacancies occur on the board other than normal expiration of terms, the board of directors may appoint to fill the vacancies. The appointed board member may fill the position only until the expiration of the term of the person he/she replaces. The appointed board member may be eligible to be nominated for election at the next regular election if the board member meets all requirements to be a member of the board.

The process for appointment to the board will be as follows:

- ▶ The chairperson will accept recommendations from the board of directors and the CEO.
- ▶ A list of the nominees will be submitted to all board members prior to the meeting at which the board will fill the vacancies.
- ▶ Appointment to fill a vacancy will be made only by a majority vote of the board members present at an official meeting of the board.
- ▶ The board chairperson will notify the appointed persons and the successful appointee will be seated at the next regular board meeting.

### REMOVAL OF BOARD MEMBERS

It is the policy of the ALPI Board to remove board members who fail to perform the expected duties of a board member. A board member may be removed from the board because of:

- ▶ negligence of board duties and responsibilities.
- ▶ failure to attend board meetings regularly.
- ▶ illegal activity as a member of the board.
- ▶ acting in any manner detrimental to ALPI.

A board member may be removed by a two-third vote of the Board for cause, at any regular meeting.

### MEETING ATTENDANCE REQUIREMENT

It is the policy of ALPI board that board members must attend meetings to maintain governance continuity, to be fully informed about the issues on which they will vote, and to meet their responsibility to contribute to the decisions the board is required to make.

If a board member will be absent from all or part of any meeting, the board member is expected to contact the board secretary or the CEO as soon as the need to be absent is known.

If a board member is absent from two (2) consecutive board meetings, the board chairperson will ask the board to consider removing the board member from membership on the board.

When a board member is absent from any board meeting, the board chairperson will contact the board member and remind the board member of the meeting attendance policy.

### COMPENSATION OF BOARD MEMBERS

Board members will not be compensated for service on this board.

### REIMBURSEMENT OF EXPENSES

Board members may be reimbursed only for out-of-pocket expenses actually incurred and given prior authorization by a vote of the board. Claimed expenses must be documented by original receipts. No expenses will be reimbursed for friends or relatives accompanying a board member on ALPI business. No expenses will be reimbursed for non-business related travel or extension of stay beyond completion of the business for ALPI.

Some expenses can be deemed unreasonable and unnecessary or extravagant. Such charges will be deemed personal and not reimbursable without compelling cause and at the discretion of the board.

Reimbursement of authorized out-of-pocket expenses will be according to the same reimbursement policy applied to staff as found in the ALPI Personnel Policy Manual.

### **DIRECTORS' AND OFFICERS' ERRORS AND OMISSIONS INSURANCE**

It is the policy of ALPI to provide directors and officers liability insurance. The continuing need for such insurance will be reviewed each time the policy is due for renewal.

### **BOARD LEGAL COUNSEL**

The board will annually designate legal counsel to serve the needs of ALPI. Legal counsel may be requested to attend board meetings by request of a majority of the board members or at the mutual agreement of the board chairperson and the executive director.

Only the board chairperson, the executive director or their designee may contact legal counsel on behalf of the board. Costs billed to ALPI and associated with individual board members contacting legal counsel, auditors or other professional consultants without specific authority from the board of directors, will be billed to the board member making the unauthorized contact.

### **BOARD CORRESPONDENCE**

Correspondence from the board will be approved by the board or its chairperson. Except for reports which are legally required to be sent out over the secretary's or treasurer's name, all correspondence from the board will be over the chairperson's name. All correspondence from the board will be written on ALPI stationery and will be prepared by the office of the CEO. Use of ALPI letterhead will be limited to official agency business only.

No material or information disclosed in executive sessions of the board will be released to any unauthorized person.

### **BOARD MEMBERS SPEAKING FOR THE BOARD TO THE PUBLIC OR MEDIA**

Individual board members may not speak to the public or the media on behalf of the board unless authorized by the board to do so.

When speaking about ALPI or about board action, board members should be careful to define when their remarks represent personal opinion and when their remarks represent official board position. Board members must be aware that they are always seen as board members even when they designate comments as personal.

### **BOARD MEMBER ORIENTATION AND DEVELOPMENT**

The ALPI board believes that professional development for board members is vital to good governance of ALPI. Therefore, new board members will be given, within 30 days of election, a thorough orientation about ALPI, board operations, finance, board ethics, responsibility and liability.

The board will also include in the annual budget of ALPI a line item for board development. The line item will be used to pay for publications and materials to assist the board to learn the job, training and in-service programs oriented to board operations and travel to conferences and conventions that will assist board members to develop their governance skills.

### **AUTHORITY OF BOARD MEMBERS**

Board members have authority only when acting as a body in regular or special meetings of the board.

The board will not be bound in any way by any statement or action by any individual board member except when such statement or action is in pursuance of an adopted board resolution or special instructions by the board, or under specified delegation of responsibility.

### **BOARD MEMBER MANAGEMENT OF STAFF AND PUBLIC CONCERNS**

It is the policy of the ALPI Board that when a board member is contacted by a staff member or member of the general public who has a concern or complaint about ALPI or persons within ALPI, the board member will follow the following procedures:

- ▶ Remember that individual board members have no power or authority to speak or act for the full board.
- ▶ Listen to the person's concern.
- ▶ Express a desire to reach a satisfactory solution.

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- ▶ Explain that the board and management have established a process for handling concerns which starts with the person most immediately responsible. Suggest that the concern be discussed with the person immediately responsible.
- ▶ Refer complaints, other than staff complaints, to the official complaint form available in the administrative office. Refer staff to the grievance procedure.
- ▶ Assure the person that the executive will be informed of the concern.
- ▶ Ask the person to report back to you about the progress or resolution of the concern, if desired.
- ▶ Inform the CEO of the complaint or concern.

### **GUIDELINES FOR PROCESSING PUBLIC COMPLAINTS**

From time to time situations may occur that create legitimate complaints on the part of the public or constituents relative to ALPI. Complaints must be aired so that all sides of the issue may be heard and a rational procedure/solution found.

Anyone having a complaint, therefore, is encouraged to file a complaint. Forms may be picked up at the administrative office. All complaint forms must be signed by the person originating the complaint. The nature of the complaint should be stated as well as the relief sought.

### **STEP BY STEP PROCESS FOR PERSONS OTHER THAN ALPI STAFF TO FILE A COMPLAINT**

Each step in this procedure will give consideration to the complaint and will be a review of facts. Each individual receiving the complaint will issue a written response within a specific time period. If remedy is not achieved through the steps, the ALPI board is the final hearing body.

**STEP I -- Formal Process --** The formal process begins with the person filing the complaint. He/she prepares a written statement containing his/her name, address, and telephone number; the condition, situation, or individual being complained about and why; the requested remedy. The form should be signed, dated and filed with the individual closest to the complaint.

**STEP II --** If the complainant is not satisfied with the decision at the first level, he/she may present the complaint to the CEO (in writing) and expect response within (5) days from the date it was presented to the CEO.

**STEP III --** If the complainant is not satisfied with the decision of the CEO, he/she may submit a copy of the complaint to the ALPI board within ten (10) days of receiving the CEO's deposition.

STEP IV -- Within twenty (20) days, the board will have conducted a hearing, from which it has gathered enough testimony and/or other pertinent information on which to base its decision. Once able to reach a majority decision, it will do so in writing to the complainant. This decision is final.

**ALPI OFFICIAL COMPLAINT FORM**

PERSON FILING COMPLAINT: \_\_\_\_\_ DATE \_\_\_\_\_

WHERE YOU MAY BE REACHED:      Address: \_\_\_\_\_

\_\_\_\_\_

Phone: \_\_\_\_\_

EXPLAIN NATURE OF COMPLAINT: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

REQUESTED REMEDY: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

RESPONSE #1: (Level-line staff): \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

RESPONSE #2: (Level- CEO) \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

RESPONSE #3 (Level - board of directors): \_\_\_\_\_

\_\_\_\_\_

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## SECTION 3 - CEO Responsibilities and Functions

In the conduct of the ongoing business of ALPI, the CEO is responsible for all business operations, including management of the assets of ALPI; hiring, training, promotion, discipline and termination of employees; and for establishing and maintaining the business organization and structure to efficiently conduct the management functions of ALPI.

The CEO plans for and administers a program providing service in accordance with ALPI's stated purpose and in such a manner that optimum results are achieved in relation to the resources of the agency, and operates under the general direction of the ALPI board of directors.

### CEO COMMUNICATION/COUNSEL TO THE BOARD

The CEO will provide information and counsel to the board. Accordingly, he/she will:

- ▶ Make the board aware of special events, relevant trends, material external and internal changes and the assumptions upon which any board policy has previously been established.
- ▶ Submit required monitoring data in a timely, accurate and understandable fashion, directly addressing provisions of the board policies being monitored.
- ▶ Marshal as many staff and external points of view, issues and options as needed for fully informed board choices.
- ▶ Present information in a form that is understandable and of reasonable length.

### DELEGATION TO THE CEO

The board's job is generally confined to establishing topmost policies, leaving implementation of board policy to the CEO. All board authority delegated to staff is delegated through the CEO.

The CEO is authorized to establish all further policies, make all decisions, take all actions and develop all activities which are true to the board's policies. The board will respect the CEO's choices so long as the delegation continues. This does not prevent the board from obtaining information about activities in the delegated areas.

No individual board member, officer or committee has any authority over the CEO. Information may be requested by such parties, but if such request, in the CEO's judgment, requires a material amount of staff time, it may be refused.

Acting with the authority granted above, the CEO may not perform, allow or cause to be performed any act which is unlawful, insufficient to meet commonly accepted business and professional ethics for the "prudent person" test, in violation of funding source requirements or regulatory bodies, or contrary to explicit board constraints on CEO authority.

Should a situation arise wherein the CEO deems it unwise to comply with a board policy, he/she will inform the board of directors. Informing is simply to guarantee no violation may be intentionally kept from the board. It is not for the purpose of receiving approval. Board response at that time does not exempt the CEO from subsequent board judgment of his/her action.

### AREAS OF RESPONSIBILITY DELEGATED TO THE CEO

In the area of human resources the CEO relates both to the board and to the staff of ALPI, but has ultimate responsibility to the board.

For the board of directors the CEO:

- ▶ develops and recommends to the board of directors, specific, written, long and short-range plans for the development of ALPI programs and services;
- ▶ maintains appropriate relations with the board and various board committees, and keeps them informed.
- ▶ interprets trends in the fields of service in which ALPI is engaged, by maintaining involvement in the professional field as a whole.
- ▶ assists with orientation and training programs for the board.

For the ALPI staff the CEO:

- ▶ supervises and directs key staff in the performance of their duties
- ▶ evaluates the performance of key staff members
- ▶ provides overall control of and direction for the personnel of ALPI, including active participation in or approval of personnel actions
- ▶ manages volunteer staff activities.

In the area of planning, the CEO:

- ▶ evaluates the services being provided by ALPI in relation to specified goals and standards, and recommends modifications, where appropriate recommends new programs to the board.

In the area of finance, the CEO:

- ▶ prepares ALPI budgets and is accountable for control of these resources once approved.
- ▶ directs all financial operations of ALPI.

In the area of constituent relations, the CEO manages all activities including coordinating board activities in this area.

In the area of public relations, the CEO interprets the function of ALPI to the community by assisting the board, through direct involvement and through public relations programs, including personal contact, descriptive program literature, and the media.

In the area of interagency relations, the CEO:

- ▶ maintains appropriate relations with other professional and service groups in the community.
- ▶ maintains appropriate relations with federal, state, and local government units.
- ▶ maintains appropriate relations with other agencies in similar fields of service.

In the area of ALPI organizational operations, the CEO:

- ▶ recommends policies to the board and/or assists the board, in the formulation of policies for the effective and economical operation of ALPI and its programs.
- ▶ ensures implementation of the policies adopted by the board.
- ▶ has chief administrative responsibility for maintenance of agency facilities, and regular reporting to various bodies.
- ▶ carries chief staff responsibility to ensure that legal obligations of ALPI are met.

### MONITORING CEO PERFORMANCE

Monitoring CEO performance is somewhat synonymous with monitoring organizational performance. The board delegates management to the CEO and must have a process for ongoing monitoring of the CEO's performance of the delegated duties. The purpose of monitoring is to determine the degree to which board policies are being fulfilled.

The board will monitor CEO performance by awareness of the CEO's job description, careful attention to all reports delivered to the board and through an annual written evaluation of the CEO's job performance.

### CEO PERFORMANCE EVALUATION

It is the policy of ALPI to regularly evaluate the work performance of the CEO.

The evaluation will be given at the board meeting so that all board members participating in the evaluation will have had a full year of interacting with and observing the CEO's performance.

Any annual increase for the CEO will be determined after completion of the annual performance evaluation.

Although the evaluation will be facilitated by the board chairperson, the entire board will participate in the evaluation process.

The process begins with a review of the current job description to determine accuracy and appropriateness. The team next develops an evaluation checklist based upon the job description and organization objectives. Respondents will be asked to rate the director's performance against each line item on the checklist as follows:

- \_\_\_\_\_ very good
- \_\_\_\_\_ acceptable
- \_\_\_\_\_ needs improvement

Space should be allowed on the checklist at each line item for comments.

The team mails the checklist to all board members with a self-addressed stamped envelope so that all evaluations are returned to the home or business address of the board chairperson. A request is sent with the evaluation form to complete within ten days. Respondents have the option of signing or not signing their evaluation forms. Constructive criticism from board members should be specific so that appropriate corrective action may be taken by the CEO.

A copy of the evaluation checklist is also mailed to the CEO with the request to complete a self-evaluation and recommend performance objectives for the upcoming year. The form completed by the CEO will not be included in the board's compilation of results.

When the board members have returned the evaluation forms, the chairperson of the board makes up a composite checklist which, by line item, indicates the number of responses for each rating. All comments are randomly listed without identifying the source of each comment.

Next, the full board meets, without the CEO present, to review the composite evaluation and performance objectives for the upcoming year. The board must reach consensus on each item in the checklist.

Then the full board chairperson meets with the CEO to present the full board's conclusions about the evaluation. Should the CEO be in serious disagreement with part or all of the evaluation, the right to respond to the full board must be available. Such a response should lead to a dialogue in which the problem area can be resolved in a candid and professional way.

The final agreed-upon evaluation should be signed by both the CEO and the board chairperson. A copy of the evaluation is given to the CEO, and the original evaluation is kept on file by the board chairperson to be passed on to the next board chairperson. A copy of the evaluation is not kept in the personnel office.

Board members will not solicit information regarding the CEO's performance from subordinate staff. Staff play no role in the evaluation. The board recognizes that including staff can seriously erode the relationship which must exist between the CEO and staff.

### BOARD/CEO RELATIONSHIP

The board of directors recognizes and maintains the following guidelines in the board's relationship with the CEO:

- ▶ Good management is recognized as one of the key factors in the success of the organization. The board reserves the authority to establish policies, approve plans, and programs and delegate authority to the CEO.
- ▶ The board will approve policies and long-range plans and programs for ALPI, and delegate authority to the CEO to execute and carry out the policies, plans and programs. The CEO will be responsible for hiring capable personnel within the limitations of board policy and budget constraints, determining the appropriate compensation, training, supervising, disciplining and terminating if necessary.
- ▶ Board members will refrain from individually discussing management and personnel issues with ALPI personnel other than the CEO. The board, in consultation with the CEO, may confer with key personnel at regular or special meetings of the board.
- ▶ Authority for management of ALPI will be through the board of directors to the CEO, then to other personnel. The board will require full and timely information from the CEO concerning pertinent matters that relate to the management of ALPI.
- ▶ The board recognizes that efficient management of ALPI can exist only through mutual understanding and cooperation between the board and the CEO. The board also recognizes that the CEO is accountable to the board to show results, but the CEO cannot perform well and show good results if not given latitude to exercise independent judgment in executing board policy. Therefore, the board grants that latitude of judgment and discretion and expects full accounting of performance from the CEO.
- ▶ The board recognizes its position as the employer of the CEO and will be responsible for a systematic annual evaluation of the CEO's performance. The evaluation will be for the purpose of improving the CEO's performance -and to provide a basis for consideration of the CEO's salary for the next year.
- ▶ The CEO's employment with ALPI may be terminated for cause upon written notice to the CEO and in accordance with the board/CEO contract in effect.

## **SECTION 4 - Board Meetings**

### **CONDUCT OF MEETINGS**

So meetings may be conducted in the most orderly manner, discussion of agenda items will be limited to communications among board members, between the board and the CEO, and among the board, CEO and those the board and CEO request to make presentations.

### **BOARD CALENDAR**

A calendar will be established by the board annually at the beginning of the board year. The calendar will list dates and locations of the bi-monthly meetings.

### **REGULAR MEETINGS**

Regular meetings of the board will be held bi-monthly. So that board members can schedule for the meetings well in advance, the specific dates will be established for the full year at the board's orientation meeting each year. The board will make every effort to maintain those dates as board meeting dates.

### **SPECIAL MEETINGS**

Special meetings of the board should be called only rarely when the business to be addressed cannot wait until the next regularly scheduled meeting. A special meeting of the board may be called by the Chairperson of the board or by any three board members. A call for a special meeting will state the business to be addressed by the board at the special meeting. Every member of the board must be notified of the special meeting at least three days prior to the established meeting time.

### **ABSENCE FROM MEETINGS**

When a board member is absent from two consecutive regular meetings and is not excused by the board, the board may declare the office of the member vacant after the third absence.

### **OPEN BOARD MEETINGS**

All Board Meetings shall be open to the public.

## CLOSED MEETINGS

All regular meetings of the board will be open to (members, public) except as specified below. The board will close its meetings only when:

- ▶ discussion by the board could harm the reputation and character of any person.
- ▶ information discussed by the board could have an adverse legal impact on the organization's legal position if the information were public knowledge.
- ▶ information discussed by the board could have an adverse financial impact on the organization if the information were public knowledge.

To close a meeting, a motion must be made and approved by a majority of the board stating the specific reasons for closing the meeting. Business conducted in the closed session must pertain directly to the stated purpose for closing the meeting.

## MEETING AGENDA PACKET

All matters to be considered by the board at the meeting will be included on the consent agenda and/or the general agenda in the board packets delivered to board members at least five days prior to the meeting. The board may vote to waive this requirement to discuss only items on the published agendas by a majority vote of the board.

Meeting agendas will be developed by the CEO and approved by the board chairperson prior to distribution to other board members.

All board members will have an opportunity to request items be placed on the consent agenda and/or general agenda prior to the agendas being published and distributed.

The agendas may be amended after the meeting is convened only in cases where immediate action on the item is necessary, or when the item is for board information, and only by consensus of a majority of the board members. A board member or the CEO may request changes to the agendas during the item on the agendas that asks the board to approve the agendas.

The ALPI board meeting agendas will approximate the following outline:

- ▶ Call to order by the board chairperson or other presiding officer and determination of a quorum
- ▶ Approval of agenda
- ▶ Consideration, correction and approval of minutes of the previous meeting Public forum or member forum
- ▶ Consideration and acceptance of the financial report
- ▶ CEO's Report
- ▶ Standing committee reports and recommendations for board action
- ▶ Special committee/task force reports and recommendation for board action

- ▶ Unfinished business
- ▶ New business
- ▶ Adjournment

### MEETINGS BY CONFERENCE CALL

It is not the practice of the ALPI Board to hold meetings by conference telephone calls. However, emergency situations may dictate that some board members cannot attend the meeting in person, but may attend via telephone conference call. In those cases, any or all of the board members may participate in the meeting, by conference telephone.

All board meetings in which one or more of the board members are participating by telephone will be conducted under the following rules:

- ▶ All board members participating in the meeting must be able to hear each other.
- ▶ All rules for calling meetings and notification of board members as spelled out in other sections of this policy manual will apply.
- ▶ All rules for conduct of meetings, including role call and quorum, will be followed.
- ▶ Minutes of the meeting will be kept. Minutes will be reviewed and adopted by the board at the next regularly scheduled board meeting.

### STAFF ATTENDANCE AT BOARD MEETINGS

Since it is the policy of the ALPI board to hold our CEO accountable for all management of ALPI, it is left to the CEO to invite any staff to the board meeting that the CEO needs as resource for issues the board will consider during the meeting.

### PUBLIC COMMENT

The general meeting agenda, except special meetings of the board, will include an item that is allocated no more than 2 minutes and labeled "Public Comments." All persons, other than board members, wishing to speak will, prior to the meeting, complete a comment card, like the one shown below, listing the nature of the comment and the speaker's name. The card will be handed to the board chairperson. Procedures for the public comment will follow the outline on the form below.

#### PUBLIC COMMENTS FOR ALPI BOARD AND REQUEST TO BE HEARD

The ALPI Board welcomes you to this meeting. We conduct our meetings in strict compliance with the state open meetings law. That law requires that our board meetings be open for public observation, but it does not require that the public be allowed to participate in the meetings.

However, we value the ideas and insights of others. Therefore, it is the policy of this board to allow 2 minutes of each meeting for public comment. If you wish to speak to this board during this section of our agenda, please complete the comment card and hand it to one of the designees before the meeting. Only persons who have completed the comment card and given it to a designee prior to the convening of the meeting will be allowed to speak.

When the board reaches the "Public Comment" section of the agenda, the board chairperson will allow 2 minutes for individuals to speak to the board.

Do not expect the board to respond at this meeting to your questions or requests for information or requests for action. The board will note your request and respond at a later appropriate time after board members have an opportunity to deliberate about the request.

At other times during this meeting, board members may wish to ask for information from persons in the audience, but please refrain from comment unless the board asks you to comment. Board members are always anxious to hear from constituents outside the meeting, but our meeting agenda is usually full and does not allow us time for a continuous open forum. Thanks for helping us conduct an open and orderly meeting.

**REQUEST TO SPEAK TO THE ALPI BOARD DURING PUBLIC COMMENTS**

This Comment Card must be completed and handed to a designee before the meeting if you wish to speak to the ALPI Board during the "Public Comment" section of the meeting agenda. The Public Comments will be conducted according to the format explained above.

Name: \_\_\_\_\_

Group/Organization you represent, if any: \_\_\_\_\_

Subject: \_\_\_\_\_

**QUORUM**

A quorum of the board shall consist of at least one-half plus one of the seated membership.

**VOTING**

The vote of a majority of the votes entitled to be cast by the members present at a meeting at which a quorum is present is necessary for the adoption of any matter voted on by the members.

Voting to elect officers of the board will be by secret ballot.

A board member who is present at a meeting of the board at which action is taken on any corporate matter, will be presumed to have concurred in the action taken unless the dissent of the board member is entered in the minutes of the meeting. Such dissent will be indicated by a simple "no" vote on the action.

A board member who is absent from a meeting of the board at which action is taken will be presumed to have concurred in the action unless the trustee will file a written dissent with the secretary of the board within a reasonable time after learning of the action.

## DISQUALIFICATION FOR VOTING

No member of the ALPI board may vote on any matter in which the board member has a direct or indirect financial interest .

No member of the board nor any employee of ALPI will have proprietary business dealings with ALPI which directly or indirectly results in gain or profit to such board member or employee unless he/she first files a sworn statement with the chairperson of the board of the intent to have such business dealings, and states therein the nature, type, and extent of the transaction and interest of the board member. Remaining board members must, by majority vote, give approval.

## MINUTES OF THE BOARD MEETINGS

Records of all actions of the board will be set forth in the minutes of the meeting. Minutes will be kept on file as the official record of the ALPI board.

The office of Secretary of the Board will be custodian of the minutes. Minutes will be recorded in writing during each meeting by the board's secretary or as needed by a member of the ALPI clerical staff or by a volunteer,

Minutes of the meeting are a record of the actions of the board, not a record of discussion. Minutes of ALPI board meetings will include:

- ▶ the date, time and place the meeting was called to order.
- ▶ the type of meeting--regular, special or continued.
- ▶ the name of the presiding officer.
- ▶ a statement that a quorum was or was not present.
- ▶ the names of those board members present and the names of those board members absent from the meeting.
- ▶ the exact wording of all motions, whether passed or failed. disposition of each motion made--passed or failed. (If the vote is by roll call, each board member's vote will be recorded by name. When a ballot vote is taken, the number voting for and the number voting against will be recorded. No views, protests or explanations from board members about the vote will be recorded in the minutes unless the full board votes to allow such entries.)
- ▶ notation of each committee report
- ▶ notation that financial reports were examined by the board.
- ▶ notation of time of adjournment of the meeting.

Committee reports or resolutions may be attached to the minutes if these items are important clarification for the minutes of the meeting.

#### **ELECTRONIC RECORDING OF THE MEETINGS**

To ensure free discussion and debate at meetings of the board, no electronic recording devices may be used by individual board members, CEO or anyone else attending the meetings.

#### **PARLIAMENTARIAN AUTHORITY**

Meetings of the ALPI Board will be governed by the parliamentary rules as outlined in Robert's Rules Newly Revised in all cases where current bylaws and current board policies do not apply.

## SECTION 5 - Organizational Finance

### FISCAL YEAR

The ALPI fiscal year will be the first day of July to the last day of June.

### FINANCIAL MANAGEMENT

Financial resources of ALPI are the responsibility of the board of directors. The board will:

- ▶ have a clear plan for acquisition of financial resources to pay for the programs and services provided by ALPI.
- ▶ provide guidelines for management and allocation of financial resources which will produce optimum benefit for those we serve.
- ▶ monitor and evaluate the financial plans and guidelines of ALPI to ensure the financial integrity of ALPI.

### BUDGETING

An annual operating budget will be prepared by the CEO and presented to the board for approval at least 60 days prior to the beginning of the next fiscal year. The budget will reflect the cost of carrying out the programs and services of ALPI for the next fiscal year. This budget will also reflect the anticipated revenues of ALPI.

The budget will be viewed by the board as their financial plan for ALPI, and approval of the budget by the board will be authority for the CEO to manage ALPI's finances according to the plan without seeking further approval of the board. However, the CEO will keep the board well informed of the ongoing status of the financial plan, and will not make expenditures outside of the budget plan without seeking board approval to amend the budget. Amendments to the budget will be presented to the board for approval for any of the following reasons:

- ▶ ALPI enters into compacts or contracts that were not included in the approved budget.
- ▶ Management proposes a major expenditure that was not included in the approved budget.
- ▶ Significant unanticipated revenues are received or cost overruns occur.

### WORKING CAPITAL RESERVES

A working capital reserve sufficient to keep ALPI operating for at least a 60-day period will be maintained at all times.

### ACCOUNTING

The accounting system used by ALPI will utilize generally accepted accounting practices that are required and/or recommended by regulatory or lending agencies and the ALPI auditor.

The accounting practices and procedures used by ALPI will allow for adequate management of ALPI's revenues and expenses, and will provide adequate systems of monitoring by the board of directors as well as outside auditors.

### FINANCIAL REPORTS AND AUDITS

Reports reflecting the financial condition of ALPI will be presented to the board monthly. These financial reports will include:

- ▶ at least quarterly status of expenditures on major capital projects.
- ▶ monthly statement of cash flow.
- ▶ monthly revenue and expense statement for the month and year-to-date with comparison to the budget.

An internal audit process will be established and maintained. The CEO will report, at least quarterly, any significant findings to the board. Gross violations or breach of trust will be reported to the board immediately upon discovery.

An annual audit of ALPI's finances will be conducted by an independent auditor appointed by the board. The scope of those audits will be determined from time to time by the board.

The board will annually approve an accounting firm to do the audit, and the contract for audit will be formally bid at least once every five years.

The CEO will solicit bids for the audit from two or more qualified firms, and will recommend to the board a firm to perform the audit. The board's selection will be based on consideration of cost, professional qualifications, reputation and relevant experience.

## **SIGNING CHECKS**

Authorized signatories for all general fund accounts must include two of the following: the chairperson of the board, the treasurer of the board, other board members designated as signatories by the board, the CEO.

The Board may authorize the use of an automatic signature stamp for checks. The signature stamp will contain the facsimile signatures of two authorized signatories.

It is the responsibility of the CEO to ensure that signatures can be gained from appropriate signatories so that payment can be made on obligations of ALPI. It is also the responsibility of the CEO to ensure that adequate controls and safeguards have been established to ensure disbursement of funds only for proper purposes.

It is the responsibility of all check signers to ensure that there is adequate documentation, consistent with good internal controls, for valid payment of checks they sign.

## **USE OF CREDIT CARDS**

Corporate credit cards will be provided to designated travelers by the CEO for the sole purpose of conducting official corporate business.

No personal items and/or expenses are to be billed to any Agency (directly billed) corporate credit card (i.e. Telephone, Gas, American Express, etc).

Each traveler and/or employee issued a corporate credit card will be required to read and sign a copy of the Corporate Credit Card Usage Authorization Form with a copy forwarded to the Budget and Finance Director for reference and payment certification.

## **INVESTMENT PRACTICES**

Funds not required for current operations will be invested according to an investment plan approved and revised annually by the board.

Investments must be government-secured and guaranteed.

Investments may be made at the discretion of the CEO within the plan adopted by the board, with the exception of any investments in securities with a maturity of more than one year which must have the prior approval of the board.

The CEO will present reports to the board at least quarterly which show the status of all investments, including the rate of return and current market value.

### CEO LIMITATION

The CEO may not risk financial losses to ALPI beyond those that may occur in the normal course of business. The CEO will:

- ▶ ensure against embezzlement, casualty losses to full replacement value, and against liability losses (to board members, organization or staff) beyond the minimally acceptable prudent level.
- ▶ ensure that all personnel with access to significant amounts of ALPI money are appropriately bonded.
- ▶ ensure that facilities and equipment are properly maintained.
- ▶ limit exposure of ALPI, the board or staff to claims of liability.
- ▶ disburse funds only under controls sufficient to meet the board-appointed auditor's standards.
- ▶ invest operating capital only in secure short-term investments.
- ▶ ensure off-site backup of all computer and other financial records necessary for uninterrupted operation of ALPI.

### PURCHASE ORDERS

Staff purchases of supplies and materials will be made only with a properly authorized purchase order signed by the CEO or a member of the management staff authorized by the CEO to sign purchase orders

### SPENDING AUTHORIZATIONS

The CEO may make expenditures consistent with the board-approved budget without further board approval. However, expenditures that are not within the board approved budget must be formally approved by the board of directors.

A list of anticipated major capital expenditures should be included with the annual budget that is submitted to the board for approval.

Unbudgeted emergency repairs to the physical plant or equipment that must be completed immediately, and cannot be practically submitted to the board for approval, may be authorized by the CEO. The board of directors will be informed of the expenditures as soon as possible.

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**INSURANCE BONDING PROTECTION OF ALPI**

The CEO will recommend to the board all necessary bonding of staff members who handle ALPI funds and recommend to the board any appropriate insurance protection to protect the finances of ALPI.

**CHARITABLE DONATIONS BY ALPI**

Because of the nature of the mission of this organization, ALPI does not make charitable contributions.

**BAD DEBTS OWED TO ALPI**

If the total receivable from any one individual or organization is \$100 or less, the CEO may authorize the debt to be written off if he/she believes the debt is uncollectible.

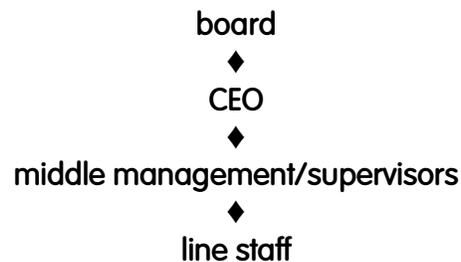
Write-offs of debts over \$100 which the CEO believes are uncollectible may be authorized only by a vote of the ALPI board of directors.

Delinquent accounts may be assigned for collection to either legal counsel or a collection agency, or taken to small claims court as the CEO deems appropriate. Collection efforts will continue even after writeoff until actually collected or the attorney, collection agency or small claims court deems further efforts will be futile or not cost-effective.

## SECTION 6 - Employment Policies

### CHAIN OF COMMAND

The ALPI board believes strongly in the chain of command:



The board is concerned about the needs and success of staff, and will work through the chain of command to facilitate the success of all ALPI staff.

The board expects all staff to respect and follow the chain of command when registering complaints, making suggestions and in any other way communicating with the board about the business of the organization. Staff members who take complaints, requests, criticism or other organization business directly to the board or individual board members without working through the CEO will be considered insubordinate and subject to disciplinary measures by the CEO.

The board expects all board members to respect and follow the chain of command when communicating with staff about the business of the organization. Board members will not take complaints, suggestions, requests or demands to the staff except through the CEO. When a board member receives a complaint or suggestion from a staff member other than the CEO, the board member will remind the staff member of this board's policy about following the chain of command. The board member will also report the staff communication to the CEO.

### EMPLOYEE GRIEVANCE PROCEDURE

The objective of this policy is to promptly and harmoniously resolve grievances, and to facilitate communication among ALPI employees. This policy applies to all regular employees. This policy is part of the ALPI Personnel Policies Manual, but it is also included here in the Board Policy Manual to make it clear to all board members that they can refer employees to the grievance procedure, and that the board is not involved in the grievance procedure.

The definition of a grievance is: "A dispute by an employee that involves questions of interpretation or application of wages, hours, terms and conditions of employment or disciplinary actions. Probationary employees may not grieve termination from their positions."

The employee grievance process will follow these steps...

Step 1: The employee will present the grievance verbally to his/her immediate superior within five working days of the alleged violation or the date the employee becomes aware of the alleged violation, whichever is later. The superior receiving the complaint will attempt to resolve and implement the resolution and respond to the employee in writing no later than five working days from the date the employee brought the complaint.

Step 2: If the grievance is not resolved in step 1, the employee may submit a written grievance to the CEO within five working days of the date the response from step one was due or received ' whichever comes first. The CEO will have five working days from receipt of the written step 2 grievance to investigate the matter and respond in writing to the grievant.

The CEO's written response will be the final disposition of the grievance. Staff grievances may not be appealed to the ALPI board of directors.

### **PERSONNEL POLICIES**

Appropriate and complete personnel policies will be adopted by the CEO and reviewed by legal counsel for accuracy and completeness. The CEO will report to the board that this has been done, and will report annually that all personnel policies have been reviewed and updated.

Personnel policies are published in a separate Personnel Policy Manual. All employees will be given a copy of the most recent and updated Personnel Policy Manual, and will sign acknowledgment of such receipt.

Implementation and administration of all personnel policies are the responsibility of CEO.

### **PROFESSIONAL MEMBERSHIPS**

The board recognizes the importance of employees staying current in fields related to their employment and the importance of maintaining professional status. Therefore, ALPI may pay for the cost of professional memberships for employees within the limits of the budget and provided such membership is in the best interest of ALPI.

ALPI may also pay the cost for employees to attend meetings related to their professional memberships if the meeting is judged to be in the best interest of ALPI.

Requests for reimbursement must be made to the CEO and be given prior approval by the CEO.

### NEPOTISM

Board members and members of their immediate families may not be employed by ALPI, except by vote of the board. Members of the immediate family of the CEO may not be employed by ALPI without a vote of the board.

The term "immediate family" as used above is defined as the relationship of:

- husband and wife;
- father, mother, son or daughter;
- father-in-law, mother-in-law, sister, sister-in-law, brother, brother-in-law
- grandmother, grandfather, aunt, uncle, niece and nephew.

### EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMATIVE ACTION

All employment decisions and personnel actions will be administered with the purpose of promoting and ensuring equal opportunity for all persons. All promotional opportunities will be publicized by one of the following means:

- 1) Positions covered by labor agreements--by formal vacancy posting, bid evaluation, and awarded in accordance with the terms of the appropriate agreements.
- 4) Management and secretarial positions--by bulletin board notification to employees of the vacancy, inviting submission of a written summary of qualifications for supervisor's consideration. In the absence of qualified in-house applicants, the position may be filled from sources outside ALPI.

All hiring and promotional decisions will be made on the basis of valid, written job requirements set forth in the appropriate position description or vacancy posting.

All ALPI social and recreational programs will be administered on a non-discriminatory basis.

### SEXUAL HARASSMENT

Sexual harassment undermines the integrity of the work environment and will not be tolerated within the ALPI Organization. Sexual harassment may include words as well as acts, sexual advances, offensive touching and offensive or derogatory sexual comments. All such conduct is forbidden particularly when:

- submission to such conduct is explicitly or implicitly made a condition of employment.
- submission to or rejection of such conduct by an individual is used as a basis of employment decisions affecting the individual.
- such conduct has the purpose or effect of substantially interfering with an individual's work performance, or creating an intimidating, hostile or offensive

work environment.

Any person who believes that he or she has been subject to sexual harassment by a supervisor, fellow employee, board member, or any person calling upon the organization, should contact his/her supervisor or the CEO. If the person believes the CEO is the cause for a sexual harassment complaint, the complaint should be directed to the chairperson of the ALPI board. All sexual harassment complaints will be promptly investigated. Where harassment is found to exist, immediate corrective action will be taken.

### **SMOKING ON ALPI PREMISES**

Smoking and the use of tobacco is allowed within all ALPI designated areas.

ALPI will assist smokers wishing to quit smoking. Several options in this regard will be available to smokers through the human resources department. Those smokers wishing assistance in quitting smoking should contact the human resources department.

### **DRUG-FREE WORKPLACE**

Employees are ALPI's most valuable resource, and for that reason their health and safety are of paramount concern.

The manufacture, distribution, possession or use of alcohol or controlled substances, including amphetamines, barbiturates, heroin or **opiate** derivatives, or hallucinogens, while on the job or on ALPI property will result in disciplinary action.

Alcohol is prohibited on ALPI property and in ALPI operations, and will not be allowed at any event or function hosted by ALPI. No officer or employee of ALPI is authorized to provide or use alcoholic beverages on behalf of ALPI at any location. ALPI funds may not be used to purchase alcoholic beverages.

The legal use of drugs or controlled substances which are prescribed by a licensed physician is not prohibited, but employees in positions where such drug usage may affect the safety of themselves or others are required to make such use known to an appropriate ALPI supervisor. Minimally, this obligation applies to employees operating ALPI vehicles and employees using equipment which, if improperly used, may result in personal injury or property damage.

Any physical examination that ALPI requires may include testing for drug or alcohol use and abuse. Further, if ALPI has probable suspicion to believe that an employee is using or is under the influence of controlled substances or alcohol, the employee must submit to testing. If the employee refuses to submit to the testing or sign the consent form to allow such testing, it will constitute a presumption that the employee is under the influence of alcohol or drugs. Refusal to consent and cooperate in the drug testing will be grounds for immediate discipline.

Law enforcement officials will be notified whenever illegal drugs are found in the workplace, and ALPI will fully assist in any resulting investigation and prosecution.

Whenever possible, ALPI will assist employees in overcoming drug, alcoholism and other problems which may adversely affect employee job performance, but ALPI will not tolerate drug usage that may affect the safety of its work force or others.

### **SAFETY AND LOSS CONTROL**

The State of Florida has a compelling interest in protecting the public from sexual predators and in protecting children from predatory activity. The Florida Legislature has passed "The Florida Sexual Predator Act" which prohibits a sexual predator from working with children either for compensation or as a volunteer. The Agency will follow the pleadings of the Florida Sexual Predator Act.

ALPI is committed to maintaining safety in its operations, on its property and in the delivery of programs and services.

The CEO will provide for and actively promote ongoing safety and loss control training for all employees. The CEO will institute procedures, where necessary, to ensure the safety of the work environment, and will provide appropriate equipment to employees sufficient for the performance of their duties.

Accidents and losses due to accidents will be reported to the board monthly.

When necessary, the CEO will review safety concerns and risk management plans with legal council to ensure legal compliance.

### **REFERENCES FOR EMPLOYEES LEAVING**

It is the policy of ALPI Board that no employee or board member of ALPI will provide performance references for/about former employees.

When requests for such references are received, with appropriate releases from the former employee, they will be referred to the CEO of ALPI. The CEO will provide the requesting party only the dates of employment for the former employee, and a copy of this policy statement.

## SECTION 7 - Board Officers

Officers of the board will be a chairperson, vice-chairperson, secretary and treasurer elected by a majority vote (50% plus one) of the board.

The chairperson of the board will collaborate with the CEO to prepare board meeting agendas, preside at board meetings, appoint committees and committee chairpersons, sign official documents requiring signature, and may represent the board in public and official capacities as instructed by the board. The chairperson will also:

- ▶ chair the Executive Committee.
- ▶ make special assignments and appoint representatives to other organizations.
- ▶ act as liaison between board and CEO.
- ▶ encourage the board to do long-range planning.
- ▶ assist board members to build their board skills.
- ▶ act to discipline board members who violate ethical standards of the board.
- ▶ encourage all board members to participate in board activities.
- ▶ ensure that all board members' views are represented in board meetings.

The vice-chairperson will preside at board meetings in the absence of the chairperson and assume the office of the chairperson when the board determines that the chairperson can no longer serve. The vice-chairperson will also:

- ▶ serve on the Executive Committee.
- ▶ work with the chairperson to be prepared to assume that office if necessary.
- ▶ manage special assignments as requested by the board chairperson.

The secretary will oversee the records of the board, including meeting minutes, the charter and any historical documents. When required, the secretary will also sign notes, contracts and other official agreements on behalf of ALPI and at the direction of the board. The secretary will also:

- ▶ ensure that all official documents are safely passed to the next secretary.
- ▶ research ALPI records when necessary for information for the board.

The treasurer will oversee but not manage the financial records of ALPI, and ensure that the board regularly receives good reports of the financial condition of ALPI. The treasurer will also:

- ▶ assist the board to understand the annual budget before approval.
- ▶ arrange in-service programs for the board so board members will be better
- ▶ able to understand the financial reporting process.
- ▶ ensure that the board arranges for an annual audit of the ALPI books.

## OFFICERS' ELECTION PROCESS

Officers will be elected immediately after the annual meeting of the board when new or reelected board members are confirmed. The board of directors will follow the following procedures in electing its officers:

- ▶ Election will be by secret ballot at a meeting at which a quorum of board members is present.
- ▶ The board will meet to elect its officers at the first meeting following the annual installation of new board members.
- ▶ Only board members present for elections will be allowed to vote for officers. There will be no "absentee ballots," or telecommunications voting.
- ▶ Officer candidates must have consented to seek office before their name is placed in nomination.
- ▶ Nominations will be open for any eligible candidate who has given prior consent.
- ▶ Board members will encourage candidates to disclose their interest in the office.
- ▶ All voting will be done using paper ballots.
- ▶ A systematic elimination process will be used in voting, i.e. if 5 candidates, vote for 3 and take top 3, vote for 2, take top 2 and then vote for 1.

## TERMS OF OFFICE

Terms of all officers will be for two years. Only properly elected or appointed members of the board may serve as officers of the board. Each officer may be succeed themselves.

## OFFICER AUTHORITY

Officers of the board are elected to be servant-leaders of the board. All authority of the officers is delegated to them by the board of directors. No officers will have any authority to speak or act on behalf of the board other than that authority specifically granted in the ALPI bylaws, in board policy or by majority vote of the board of directors.

## VACANCIES OF OFFICERS' POSITIONS

If a vacancy occurs in any elected office because of resignation, death, ineligibility to hold office, or formal removal of an officer by the board, the board may by election by a majority fill that office at a duly held meeting.

If the vacancy occurs in the chairperson's office, the vice-chairperson will assume the office as soon as the board of directors declares the position vacant. The vice-chairperson will hold the office of chairperson until the board elects a new chairperson.

A vacancy is filled in the prescribed manner of election of officers in this policy.

## REMOVAL OF OFFICERS

The ALPI board has the right to remove any officer from that elected position by the same authority that elected the officers. Officers may be removed from office for:

- ▶ gross or willful neglect of the duties of the office.
- ▶ misuse of ALPI funds.
- ▶ conviction of a felony.
- ▶ intentional lack of public support for the ALPI mission, staff or programs.
- ▶ failure to inform the board about issues that might impact board decisions.

Procedure for removal of any officer from office will be a simple majority vote of the board.

## **SECTION 8 - Committees of the Board**

The board may establish or abolish standing or special committees as necessary.

### **COMMITTEE PURPOSE**

It will be the purpose of any committee appointed by the ALPI board to assist the board of directors to govern more efficiently. A board committee is not designed to do staff work. Committees will be used to investigate, deliberate and analyze special issues on behalf of the board.

### **COMMITTEE AUTHORITY**

Any committee established by the board will have only the powers specifically delegated to it by the board. Functions of each committee will be in writing as part of board policy or recorded in the minutes of the meeting at which the committee was established.

### **COMMITTEE ACCOUNTABILITY**

Committees are a subsidiary of the board, and will be expected to report their work to the full board on a regular basis. Each committee will be expected to make recommendations to the board for action, such recommendations to be made by a member of the committee in the form of a motion at a full board meeting.

The ALPI board will annually review the work of each committee and determine which committees will be reappointed and which committees will be abandoned as no longer necessary.

### **APPOINTMENT OF COMMITTEES**

The chairperson of the board will appoint the chairperson of each committee and all committee members, taking into consideration the preference of the board members for committee assignment. Board members will be polled as to their committee preference.

Non-board members may also be appointed as committee members. In appointing non-board committee members, it will be determined which board areas will need board candidates in future years. An effort will then be made to appoint non-board members from these areas as a means of leadership development. Board candidate recommendation forms may be utilized in this process.

### EX OFFICIO COMMITTEE MEMBERS

The chairperson of the board will be an ex-officio member of all committees, but will only vote on the committee to which he/she is assigned. The CEO or the CEO's delegated representative will be a nonvoting member of all committees as resource to the committee.

### DUTIES OF COMMITTEE MEMBERS

Duties of the members of individual board committees will vary, but certain basic committee member responsibilities remain the same for all committees. Those responsibilities include:

- ▶ Attend all meetings of the committee to which the board member is assigned.
- ▶ Prepare for committee meetings by studying the agenda and researching issues to be discussed at committee meetings.
- ▶ Actively participate in discussions at committee meetings.
- ▶ Follow through promptly on any assignments for the committee.
- ▶ Support committee recommendations before the full board.

### COMMITTEE MEETINGS

The committee chairperson will convene all meetings of the committee or a majority of the committee members may call a committee meeting. Meeting dates will be coordinated with the CEO to avoid conflict and to ensure completion of staff support and research for the committee.

Minutes will be kept of committee meetings. Committees will submit a written summary of committee actions and recommendations to the board in the board meeting packet for the meeting at which committee recommendations will be considered.

### GUIDELINES FOR COMMITTEE CHAIRPERSON

The committee chairperson will be expected to lead the committee just as the board chairperson is expected to lead the board. The committee chairperson is accountable for ensuring the productivity of the committee by:

- ▶ planning the agenda for the committee meetings.
- ▶ ensuring that all members of the committee are notified of committee meetings.
- ▶ convening committee meetings, and keeping meetings on track.
- ▶ appointing a member of the committee to keep a written record of committee actions.
- ▶ encouraging the committee to take action on the issues discussed by the committee.

- ▶ ensuring that reports and recommendations for action from the committee are presented to the full board.
- ▶ leading the committee to evaluate its own operations.

### **EXECUTIVE COMMITTEE**

The Executive Committee will consist of the officers of the ALPI board. This committee will meet as necessary to prepare issues to be presented to the full board and/or to make emergency decisions on behalf of the board when it is not possible to assemble a quorum of the board. This committee will have no power other than emergency action or other powers as may be delegated to it by the full ALPI board from time to time.

### **RETIREMENT COMMITTEE**

The Retirement Committee shall serve as the Retirement Plan Administrator of the organization's retirement plan. The Retirement Committee shall consist of the Executive Committee of the Board.

## **SECTION 9 - ALPI Facilities**

The board recognizes the need by the community for adequate spaces for meetings and programs of various groups and organizations, and the responsibility of ALPI as a good corporate citizen to help meet this need. Therefore, it is the policy of the ALPI board to allow limited use of ALPI facilities by community organizations and groups.

### **CONFLICT OF USAGE**

Individuals, groups or organizations may be given permission to use ALPI meeting rooms for indefinite or extended periods of time or on a regular schedule, such as a specific date or dates in each week or month. This will be reviewed annually. Such permission may be granted by the CEO.

Requests for use of ALPI facilities for other than ALPI business will not be granted until it is clear that such use will in no way hinder the full use by ALPI. A calendar of approved requests will be maintained to avoid scheduling conflicts.

### **ACCOUNTABILITY FOR PROPER AND SAFE USAGE**

Requests must be made in writing by one person, representing a group or organization, who will be obligated to ALPI for the safe and proper use of ALPI facilities.

Individuals belonging to a group whose request is approved will be required to comply with the security procedures which are established by ALPI when using ALPI facilities.

A record will be maintained of each request received showing the name of the individual, group or organization requesting use of ALPI facilities, the date and hours of use.

### **ELIGIBILITY OF USERS**

The board, through the provisions of this policy, authorizes the use of ALPI facilities as outlined below:

- ▶ Individuals may request the use of facilities for and on behalf of a group or organization, but may not use any facilities for private use.
- ▶ Groups and organizations such as the following may be granted use of ALPI facilities:
  - civic clubs--Lions, Rotary, Kiwanis
  - community organizations--Red Cross, United Way, Boy Scouts, Girl Scouts
  - educational organizations--school boards, community college
- ▶ ALPI facilities will not be used by persons, groups or organizations for purely commercial or social purposes, political party activities or any private or public activity that will be considered controversial in the judgment of the CEO.

**ACCESSIBILITY OF FACILITIES**

It is the policy of ALPI Board that all facilities will be physically accessible according to the guidelines of the Americans With Disabilities Act (ADA). The executive will annually review the facilities to ensure that all facilities meet the minimum standards of ADA.

## SECTION 10 - Board Member Job Description

Board members are responsible for determining ALPI policy in human resources, planning, finance, community relations, and organizational operations.

- ▶ **Human Resources** - board members have three key responsibilities in this area:
  - 1) Board membership, which includes recruiting new board members, recognizing and nurturing existing board members, and providing existing board members with opportunities to grow and develop as leaders;
  - 2) CEO oversight, which includes hiring, termination, disciplining and ongoing evaluation of the CEO;
  - 3) Personnel policies, which includes policies relating to the CEO's employment, and ensuring that the CEO has complete and up-to-date policies in place for management of staff.
- ▶ **Planning** - Board members have three key responsibilities in this area:
  - 1) Establishing and reviewing ALPI mission/philosophy/goals;
  - 2) Planning which services/programs ALPI provides; and
  - 3) Evaluating ALPI services/programs and operations on a regular basis.
- ▶ **Finance** - Board members have four key responsibilities in this area:
  - 1) Ensuring financial accountability of ALPI;
  - 2) Overseeing an ongoing process of budget development, approval and review;
  - 3) Raising funds and/or ensuring that adequate funds are available to support ALPI's policies and programs; and
  - 4) Overseeing properties or investments of ALPI.
- ▶ **Community Relations** - Board members have three key responsibilities in this area:
  - 1) Ensuring that ALPI's programs and services appropriately address the needs of those we serve;
  - 2) Advocating for ALPI's services/programs which includes an awareness that board members are always emissaries of ALPI in the community; and

- 3) Cooperative action, which includes determining occasions when ALPI could/should take part in coalitions, joint operations, etc.
- ▶ **Organizational Operations** - Board members have four key responsibilities in this area:
- 1) Ensuring that ALPI's management systems are adequate and appropriate;
  - 2) Ensuring that the board's operations are adequate and appropriate, which includes writing policies for conduct of meetings and operation of board business;
  - 3) Ensuring that organizational and legal structure are adequate and appropriate; and
  - 4) Ensuring that ALPI and its board members meet all applicable legal requirements

#### PERFORMANCE EXPECTATIONS FOR BOARD MEMBERS

In performing duties as a member of the ALPI board, every board member is expected to:

- ▶ demonstrate a strong belief and commitment to ALPI's mission.
- ▶ devote the necessary time to prepare for and participate in board and committee meetings.
- ▶ exhibit high ethical standards and integrity in all board actions.
- ▶ be an enthusiastic advocate for ALPI.
- ▶ take responsibility and accountability for ALPI and all decisions made by the board.
- ▶ spend the time necessary to learn how to do the job, and maintain an ongoing schedule of inservice to learn how to do the job better.
- ▶ demonstrate willingness to work as a team member with other board members and the CEO.

## **The Agricultural and Labor Program**

### **Member of the Board of Directors**

### **Job Description and Expectations**

**Purpose:** To advise, govern, oversee policy and direction, and assist with the leadership and general promotion of The Agricultural and Labor Program, Inc. to support the organization's mission and needs.

**Mission statement:** The Agricultural and Labor Program, Inc.'s mission is to propose, implement and advocate developmental human service delivery programs for the socially and economically disadvantaged, children and families, and farm workers.

**\*Major responsibilities:**

- Organizational leadership and advisement
- Organization of the board of directors, officers, and committees
- Formulation and oversight of policies and procedures
- Financial management, including adoption and oversight of the annual budget
- Oversight of program planning and evaluation
- Personnel evaluation and hiring of the CEO.
- Review of organizational and programmatic reports
- Promotion of the organization
- Fundraising and outreach
- Regularly attends board meetings and important related meetings.
- Makes serious commitment to participate actively in committee work.
- Volunteers for and willingly accepts assignments and completes them thoroughly and on time.
- Stays informed about committee matters, prepares themselves well for meetings, and reviews and comments on minutes and reports.
- Gets to know other committee members and builds a collegial working relationship that contributes to consensus.
- Is an active participant in the committee's annual evaluation and planning efforts.
- Participates in fund raising for the organization.

*\*Members of the board share these responsibilities while acting in the interest of The Agricultural and Labor Program, Inc. Each member is expected to make recommendations based on his or her experience and vantage point in the community.*

**Length of term:** Two years term, which may be renewed, pending approval via the board election process.

**Meetings and time commitment:**

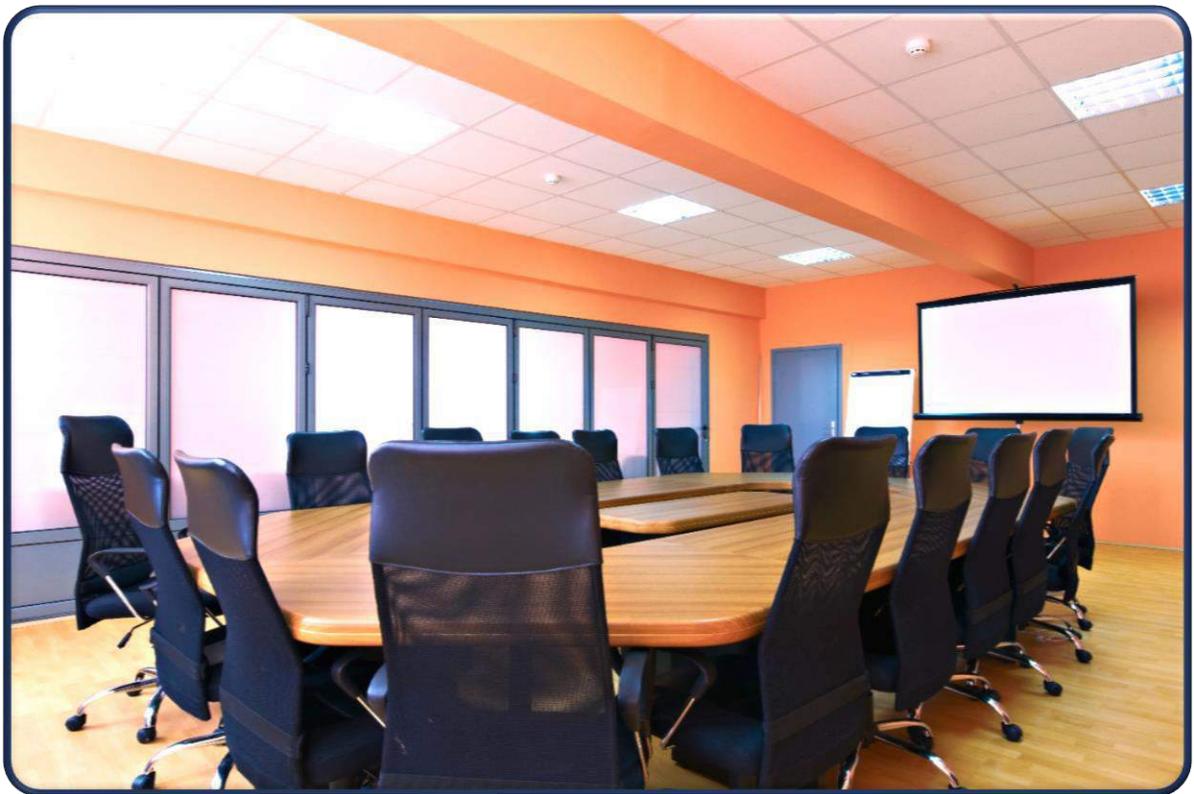
- The board of directors meets bi-monthly during the months of April, June, September, November and January on the fourth Saturday of the month at 10:00 a.m. in designation service areas as determine by the board. Meetings typically last 90 minutes.
- Committees of the board meet an average of four times per year, pending their respective work agenda.

- Board members are asked to attend no less than two meetings and all special events per year, as they are determined.

**Expectations of board members:**

- Attend and participate in meetings on a regular basis, and special events as able.
- Participate on a standing committee of the board, and serve on ad-hoc committees as necessary.
- Be alert to community concerns that can be addressed by the organization's mission, objectives, and programs.
- Help communicate and promote the organization's mission and programs to the community.
- Become familiar with the organization's finances, budget, and financial/resource needs.
- Understand the policies and procedures of the organization.
- Financially support the organization in a manner commensurate with one's ability.

# The Agricultural and Labor Program, Inc.



## 2022 Board of Directors Standing Committees

# The Agricultural and Labor Program, Inc.

## 2022 Board Standing Committees

**Note: All meeting schedules vary. However, all Committees must meet no later than 6:30 P.M. to 7:30 P.M., the eve of the next Scheduled Board Meeting.**

<b>By-Laws/Membership</b>	<b>Budget and Finance</b>
Tonmiel Rodriguez, Chairperson	Marjorie Gaskin, Chairperson
N’Kosi Jones, Vice Chairperson	Annette Jones, Vice Chairperson
Ruby Willix	Josephine Howard
Yolanda Robinson	Stacy Campbell-Domineck
<b>Yolanda Garrett, Staff Liaison</b>	<b>Dennis Gniewek, Staff Liaison</b>
<i>Standard Meeting Day &amp; Time: See Note Above</i>	<i>Standard Meeting Day &amp; Time: See Note Above</i>
<b>Program Planning</b>	<b>Board Activities (Ad Hoc)</b>
, Chairperson	The Committee named annually in the Month of June
Gena Spivey, Vice Chairperson	
Rashonda Coskey	<b>Alisa Thornton, Staff Liaison</b>
Melvin Philpot	<i>Standard Meeting Day &amp; Time: See Note Above</i>
Annie Robinson	
Dr. Donna Mills	
<b>Al Miller, Staff Liaison</b>	
<b>Myrna Rodriguez, Staff Liaison</b>	
<i>Standard Meeting Day &amp; Time: See Note Above</i>	
<b>Government Affairs</b>	
Josephine Howard, Chairperson	
Emily Hunter	
David Rucker	
Berniece Taylor	
<b>Cheryl Burnham, Staff Liaison</b>	
<i>Standard Meeting Day &amp; Time: See Note Above</i>	
<b>Executive Committee</b>	
William Holt, Chairperson	
Stacy Campbell-Domineck, Vice Chairperson	
Yolanda Robinson, Secretary	
Josephine Howard, Assistant Secretary	
Marjorie Gaskin, Treasurer	
N’Kosi Jones	
<i>Standard Meeting Day &amp; Time: See Note Above</i>	
<b>Retirement Committee: Consists of the Executive Committee – Yolanda Garrett, Staff Liaison</b>	

### Ad Hoc Committees

<b>Succession Planning Committee</b>	<b>Advisory Council Revisions Committee</b>
Josephine Howard, Chairperson	Chester McNorton, Chairperson
N’Kosi Jones	Constance Griffin
Marjorie Gaskin	
<b>Yolanda Garrett, Staff Liaison</b>	<b>Pa Houa Lee-Yang, Staff Liaison</b>
<i>Standard Meeting Day &amp; Time: As Needed. See Note Above</i>	<i>Standard Meeting Day &amp; Time: Quarterly: See Note Above</i>

**The Agricultural and Labor Program, Inc.  
2020 Board of Directors  
Attendance Y-T-D Summary**

Name	Jan 2020 Closeout	Feb Orientation & Board Mtg	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec	Jan 2021 Closeout
Katie Clarke	P	P		P		P			P		E		A
Stacy Campbell-Domineck	E	P		P		E			P		P		P
Shelia Dixon	P	P		P		P			P		E		P
Patricia Gamble	P	P		P		P			P		P		
Marjorie Gaskin	P	P		P		P			P		P		P
Brenda Gray	P	P		P		P			P		E		P
William Holt	P	P		P		P			P		P		P
Josephine Howard	P	P		P		P			P		P		P
Kim Johnson	P	A		P		P			P		E		P
Annette Jones	P	P		P		E			P		P		P
Glenda Jones	P	P		P		P			P		P		E
N"Kosi Jones	E	P		P		P			P		P		P
Chester McNorton	P	P		A		P			P		P		P
Vernon McQueen	P	E		E		P			P		P		
Annie Robinson		P		P		P			P		P		P
Barbara Grace	P												
Yolanda Robinson	P	P		P		A			P		P		P
Tonmiel Rodriguez	P	P		A		P			P		P		P
Kimberly Ross	P	E		P		P			P		P		P
David Rucker	P	P		P		A			E		A		P
Timothy Stanley	E	P		P		P			E		E		P
Ruby Willix	P	P		P		P			P		P		P
Grace Miller & Lester Roberts Board Emeritus (non-voting)													
<b>TOTAL PRESENT</b>	18	18		18		17			19		15		17

P = Present

E= Excused

A= Absent

 = No Meeting Held



**BOARD OF DIRECTORS' ZOOM MEETING**

**Zoom Meeting: <https://us02web.zoom.us/j/86047986070?pwd=dytLNHUxcWdtMEJRZ0ZhZldTdktSdz09>**

**Dial-In Information (929) 205-6099 | Access ID: 860 4798 6070**

**April 24, 2021 | 10:00 A.M.**

Board Members		Board Members		Board Members		Staff Present	
Stacy Campbell-Domineck	P	Kim Johnson	E	Tonmiel Rodriguez, Esq.	P	Cheryl Burnham	P
Katie Clarke	E	Annette Jones	P	David Rucker	P	Yolanda Garrett	P
Shelia Dixon	E	Glenda Jones	E	Timothy Stanley	P	Dennis Gniewek	P
Marjorie Gaskin	P	N’Kosi Jones	P	Ruby Willix	P	Pa Houa Lee-Yang	P
Brenda Gray	P	Chester McNorton	P	Rashondra Croskey	P	Caroline Looney	P
William Holt	P	Melvin Philpot	P	<b>Board Support</b>		Albert Miller	P
Josephine Howard	P	Annie Robinson	E	J. Thiele, Board Attorney	P	Myrna Rodriguez	P
Emily Hunter	P	Yolanda Robinson	P	Arlene Dobison, CEO	P	Twila Smith	P

The meeting was called to order, at 10:03 A.M., by Chairperson William Holt, a moment of silence was observed by all. The mission of the ALPI was recited by Yolanda Robinson. “The mission of The ALPI is to collaborate with community partners and deliver human service programs that empower the economically disadvantaged and others to be self-sufficient.”

**Roll Call**

A quorum was established.

**Secretary’s Report**

Marjorie Gaskin moved to accept/approve the Board of Directors Close-Out Meeting Minutes of January 23, 2021, February 27, 2021 Meeting minutes and revised meeting minutes for April 25, 2020. Second by N’Kosi Jones. The floor was open for discussion. There was no discussion. The motion was carried.

**Consent Agenda**

Josephine Howard moved to accept/approve the Consent Agenda. Second by Melvin Philpot. The floor was open for discussion, there was no discussion, the motion carried unanimously.

**Committee Reports**

**By-Laws/Membership**

Tonmiel Rodriguez moved to accept/approve the By-Laws/Membership recommendations for approval, that included By-Laws Revision, and seating of Gena Spivey to Board of Directors, Private Sector. Second by Josephine Howard. The floor was open for discussion, there was no discussion, the motion carried unanimously.

**Budget and Finance**

Marjorie Gaskin moved to accept/approve the Budget and Finance for month ended March 2021 for information purposes only. Second by Josephine Howard. The floor was open for discussion, there was no discussion, the motion carried unanimously.

## **Program and Planning**

Information purposes only (**Quorum was not met**)

### **Government Affairs**

Josephine Howard moved to accept/approve updating of virtual Learning, on a continuous basis, as we transition back to in-person learning, for the upcoming school year. Second by N’Kosi Jones. The floor was open for discussion, there was no discussion, the motion carried unanimously.

### **Special Events**

Ruby Willix moved to accept/approve the ALPI’s Annual Picnic to be held in Winter Haven, budget \$5,000.00 for catering & t-shirts, second by Yolanda Robinson. The floor was open for discussion. Discussion on the safety of participants by Josephine Howard, due to the continued uncertainty of COVID-19, and the CDC guidelines and recommendations. It was further agreed, not to move forward with ALPI’s Annual Picnic.

### **Advisory Revisions**

The committee did not meet.

### **Retirement**

Josephine Howard moved to accept/approve IRS 5500 and The ALPI Retirement Audit. Second by N’Kosi Jones. The floor was open for discussion, there was no discussion, the motion carried unanimously.

### **Action/Ratification**

Marjorie Gaskin moved to accept/ratify, Bank of America Line of Credit Agreement; CAT 2021-2022 Annual RFP; Vestal & Wiler CPAs 403-B Management Agreement Letter ; Emergency Home Energy Program Contract April 2021 – Sept.- 2022; Florida DEO Umbrella Agreement Modification One (1 ); Housing & Urban Development Extension Request; Office of Head Start Complaint Response; VIQI Project Agreement. Second by N’Kosi Jones. The floor was open for discussion, there was no discussion, the motion was carried unanimously.

### **Salary Schedule**

Marjorie Gaskin moved to accept/approve the Salary Schedule of Head Start/ Early Head Start Cost of living adjustment for 2021 of 1.22%, to include the Professional Development (PDIP) Increase and Professional Development and Community Involvement (PDCI) for 2021-2022. Second by Yolanda Robinson. The floor was open for discussion, there was no discussion, the motion was carried unanimously.

### **Head start/ Early Head Start Cost of Living Adjustment**

N’Kosi Jones moved to accept/approve Head Start/ Early Head Start Cost of living adjustment for 2021 of 1.22%, Second by Marjorie Gaskin. The floor was open for discussion, there was no discussion, the motion carried unanimously.

### **Head Start/ Early Head Start Carry Over Funding**

Josephine Howard moved to accept/approve to Carry over for the period of June 2021with a retroactive approval to July 1,2021; carryover of cares and unexpended dollars for period ending November 2021 to December 2021 - November 2022 budget period; second by N’Kosi Jones. The floor was open for discussion. There was discussion. The motion carried unanimously.

### **CEO Report**

Josephine Howard moved to accept/approve the CEO Report for Information. Second by Marjorie Gaskin. The floor was open for discussion, there was no discussion, the motion carried unanimously.

**Other information –**

N’Kosi Jones shared the importance of the Mission Statement and how the Mission of ALPI is helping the community.

**Other Business**

Josephine Howard moved to accept/approve Linda Halpin as Policy Council Community Representative, Department of Children and Families. Second by Marjorie Gaskin. The floor was opened for discussion. There was no discussion. The motion carried unanimously.

**Adjournment**

Marjorie Gaskin moved for adjournment at 10:47 A.M. Second by N’Kosi Jones. Motion carried Unanimously.

**Submitted By:**

*Ysanda Robinson*

ALPI Board Secretary

*April 24, 2021*

Date



# The Agricultural and Labor Program, Inc.

P.O. Box 3126  
Winter Haven, FL 33885

## Board of Directors Membership Application

Name:		Home Phone:	
Mailing Address:		Occupation:	
City, Zip Code:		Business Phone:	
Employer:		Email:	

Please check the education or skills you are willing to contribute to this Board

<input type="checkbox"/>	Accounting	<input type="checkbox"/>	Management	<input type="checkbox"/>	Public Relations
<input type="checkbox"/>	Investment	<input type="checkbox"/>	Marketing	<input type="checkbox"/>	Knowledge of services
<input type="checkbox"/>	Fundraising	<input type="checkbox"/>	Education	<input type="checkbox"/>	Public Speaking
<input type="checkbox"/>	Community Relations	<input type="checkbox"/>	Planning	<input type="checkbox"/>	Lobbying
<input type="checkbox"/>	other (please specify below)				

Can you regularly attend Bi-monthly Meetings?  Yes  No  Conflicts \_\_\_\_\_

Will you be willing to make a financial commitment to this nonprofit?  Yes  No

Why are you interested in this nonprofit Agency?

Please explain your understanding of ALPI's Mission.

Please explain your understanding of your role as a board member.

Briefly describe your Professional Affiliation (s):

List two major boards on which you serve:

Board		Term		Office	
Board		Term		Office	

Signature \_\_\_\_\_ Date \_\_\_\_\_

**THE AGRICULTURAL and**  
**LABOR PROGRAM, INC.**

**Cost Allocation Plan**  
**(Proposed)**

*Use the following model Cost Allocation Plan (CAP) as guidance for Non-profit organizations. The CAP should be tailored to fit the specific policies of each organization. If your organization's policies are different in any of the categories, please specifically identify the methodology used. Although there are different methodologies available for allocating costs, the methodology used should result in an equitable distribution of costs to programs. Recipients must have a system in place to equitably charge costs. Additionally, as required by Office of Management and Budget Uniform Guidance 2 CFR Part 200, time distribution records must reflect an after-the-fact determination of the actual activity of each employee. Considerations in determining an appropriate base for allocating costs include the relative benefits received, the materiality of the cost, and the amount of time and cost to perform the allocation.*

**THE AGRICULTURAL AND LABOR PROGRAM, INC.**  
**COST ALLOCATION PLAN**  
**(Proposed)**

**Purpose/General Statements**

The purpose of this cost allocation plan is to summarize, in writing, the methods and procedures that this organization will use to allocate costs to various programs, grants, contracts and agreements.

OMB Circular A-122, "Cost Principles for Non-Profit Organizations," establishes the principles for determining costs of grants, contracts and other agreements with the Federal Government. *The Agricultural and Labor Program, Inc.*'s Cost Allocation Plan is based on the Direct Allocation method described in the OMB Chapter II, Part 200.4. The Direct Allocation Method treats all costs as direct costs except general administration and general expenses.

Direct costs are those that can be identified specifically with a particular final cost objective. Indirect costs are those that have been incurred for common or joint objectives and cannot be readily identified with a particular final cost objective.

Only costs that are allowable, in accordance with the cost principles, will be allocated to benefiting programs by The Agricultural and Labor Program, Inc.

**General Approach**

The general approach of *The Agricultural and Labor Program, Inc.* in allocating costs to particular grants and contracts is as follows:

- A. All allowable direct costs are charged directly to programs, grants, activity, etc.
- B. Allowable direct costs that can be identified to more than one program are prorated individually as direct costs using a base most appropriate to the particular cost being prorated.
- C. All other allowable general and administrative costs (costs that benefit all programs and cannot be identified to a specific program) are allocated to programs, grants, etc. using a base that results in an equitable distribution.

## ALLOCATION OF COSTS

The following information summarizes the procedures that will be used by *The Agricultural and Labor Program, Inc.* beginning July/01/2006; revised 2/28/2020:

- A. **Compensation for Personnel Services** - Documented with timesheets showing time distribution for all employees and allocated based on time spent on each program or grant. Salaries and wages are charged directly to the program for which work has been done. Costs that benefit more than one program will be allocated to those programs based on the ratio of each program's salaries to the total of such salaries.
1. Fringe benefits (FICA, UC, and Worker's Compensation) are allocated in the same manner as salaries and wages. Health insurance, dental insurance, life & disability and other fringe benefits are also allocated in the same manner as salaries and wages.
2. Vacation, holiday, and sick pay are allocated in the same manner as salaries and wages.
- B. **Travel Costs** - Allocated based on purpose of travel. All travel costs (local and out-of-town) are charged directly to the program for which the travel was incurred. Travel costs that benefit more than one program will be allocated to those program's number of employees to the total of employees. (see Example 1).
- C. **Professional Services Costs** (such as consultants, accounting and auditing services) Allocated to the program benefiting from the service. All professional service costs are charged directly to the program for which the service was incurred. Costs that benefit more than one program will be allocated to those programs based on the ratio of each program's GL budget to the total of all the budgets. (see Example 2).
- D. **Office Expense and Supplies** (including office supplies and postage) Postage expenses are charged directly to programs to the extent possible. Costs that benefit more than one program will be allocated to those programs based on the ratio of each program's budget to the total budget (see Example 3).
- E. **Equipment** - *The Agricultural and Labor Program, Inc.* depreciates equipment when the initial acquisition cost exceeds \$1,000. Items below \$1,000 are reflected in the supplies category and expensed in the current year. Unless allowed by the awarding agency, equipment purchases are recovered through depreciation. Depreciation costs for allowable equipment used solely by one program are charged directly to the program using the equipment. If more than one program uses the equipment, then an allocation of the depreciation costs will be based on the ratio of each program's funds used to purchase the equipment to the total of such costs. (see example 3).

- F. **Printing (including supplies, maintenance and repair)** - Expenses are charged directly to programs that benefit from the service. Expenses that benefit more than one program are allocated based the ratio of the budgeted costs for each program to total budgeted costs for all programs. (see example 4 ).
- G. **Insurance** - Insurance needed for a particular program is charged directly to the program requiring the coverage.

General Liability Insurance is directly charged to a program based on the number of employees in that program. ( see example 5 ).

Property Insurance is directly charged to a program based on the insured value of the property used by that program. The value property used by more than one program is allocated to each program using the property based on the program allocation of the square footage of that property to the total square footage of all properties. (see example 6)

Automobile Insurance is directly charged to the program using the vehicle. Any vehicle used by more than one program is allocated to the program based on the percentage of insured value to the program to the total insured value of all programs. (see example 7)

Child Accident Insurance is charged directly to the child development programs based on the number of children in each program.

- H. **Telephone/Communications** - Long distance and local calls are charged to programs if readily identifiable. Other telephone or communications expenses that benefit more than one program will be allocated to those programs based on the ratio of each program's budgeted amount to the total budgeted amount of all programs to be allocated to. (see example 8).
- I. **Facilities Expenses** - Expenses are charged directly to the program using that facility. Facilities used by more than one program are allocated by the ratio of the number of employees using that facility to the total of such number of employees.
- J. **Training/Conferences/Seminars** – Allocated to the program benefiting from the training, conferences or seminars. Costs that benefit more than one program will be allocated to those programs based on the ratio of each program's budgeted amount to the total of all the program's budgeted amounts. (see example 9).
- K. **Other Costs (including dues, licenses, fees, etc.)** - Other joint costs will be allocated on a basis determined to be appropriate to the particular costs.

## Examples of Allocation Methodology

### Example 1

Expense Amount = \$5,000

Costs that benefit two or more specific programs are allocated to those programs based on the ratio of each program's personnel costs (salaries & applicable benefits) to the total of such personnel costs, as follows:

COST ITEM DESCRIPTION	ALLOCATION POOL CODES		ALLOCATION METHOD	ALLOCATED %	ELEMENT ALLOCATED COST SHARE
	PROJECT COD	ELEMENT CODES			
52300 - Travel Alloc			# Employee Base		
Agencywide	35020	350620	140	58.33%	\$ 2,916.67
		351920	5	2.08%	\$ 104.17
	34020	340620	46	19.17%	\$ 958.33
		341920	4	1.67%	\$ 83.33
	36219	501019	13	5.42%	\$ 270.83
		501119	5	2.08%	\$ 104.17
	36520	365020			
		365120	8	3.33%	\$ 166.67
	39900	999507	12	5.00%	\$ 250.00
	30620	306020	2	0.83%	\$ 41.67
	30220	300020	2	0.83%	\$ 41.67
		300320	3	1.25%	\$ 62.50
33020	430020		0.00%	\$ -	
<b>TOTAL</b>			240	100.00%	\$ 5,000.00
INVOICE AMOUNT					5,000.00

### Example 2

Expense Amount = \$10,000

Costs that benefit all programs are allocated based on a ratio of each program's budget to the total budget when applicable to total costs as follows:

COST ITEM DESCRIPTION	ALLOCATION POOL CODES		ALLOCATION METHOD	ALLOCATED %	ELEMENT ALLOCATED COST SHARE
	PROJECT COD	ELEMENT CODES			
52100- Professional Service			Fixed Cost Line Item		
Agencywide	34020	340620	\$9,500.00	7.27%	\$ 727.48
		341920	\$ 3,000.00	2.30%	\$ 229.73
	33020	430020	\$8,200.00	6.28%	\$ 627.93
	30620	306020	\$0.00	0.00%	\$ -
				0.00%	\$ -
				0.00%	\$ -
	35020	350620	\$26,000.00	19.91%	\$ 1,991.01
		351920	\$12,000.00	9.19%	\$ 918.93
	36520	365020	\$22,326.47	17.10%	\$ 1,709.70
		365120	\$3,231.59	2.47%	\$ 247.47
	36220	501020	\$25,300.00	19.37%	\$ 1,937.40
		501120	\$18,000.00	13.78%	\$ 1,378.39
	36320	507220	\$1,029.00	0.79%	\$ 78.80
30220	300020	\$2,000.00	1.53%	\$ 153.15	
<b>TOTAL</b>			\$130,587.06	100%	\$ 10,000.00

**Example 3**

Office Supplies = \$5,000

Office supply costs are allocated based on the budget of each program to the total of all the budgets.

The calculation is as follows:

COST ITEM DESCRIPTION	ALLOCATION POOL CODES		ALLOCATION METHOD	ALLOCATED %	ELEMENT ALLOCATED COST SHARE	
	PROJECT COD	ELEMENT CODES	Fixed Cost Line Item			
53000 - Office Supplies Corp	34020	341920	4,000.00	4.24%	\$ 212.03	
			0.00	0.00%	\$ -	
				0.00%	\$ -	
				0.00%	\$ -	
	35020	351920	10,000.00	10.60%	\$ 530.06	
				0.00%	\$ -	
	36119	502020	1,766.53	1.87%	\$ 93.64	
		502120	507.44	0.54%	\$ 26.90	
	36220	501020	21,197.98	22.47%	\$ 1,123.63	
		501120	17,000.00	18.02%	\$ 901.11	
	36520	365020	23,601.53	25.02%	\$ 1,251.03	
		365120	6,000.00	6.36%	\$ 318.04	
	36919	369020	1,255.00	1.33%	\$ 66.52	
	36319	507220	0.00	0.00%	\$ -	
	30620	306020	500.00	0.53%	\$ 26.50	
	30220	300020	2,500.00	2.65%	\$ 132.52	
		300320	1,500.00	1.59%	\$ 79.51	
	33020	430020	4,500.00	4.77%	\$ 238.53	
	<b>TOTAL</b>			<b>\$94,328.48</b>	<b>100.00%</b>	<b>\$ 5,000.00</b>
	INVOICE AMOUNT					\$5,000.00

**Example 4: Printing Costs = \$5,000**

Printing costs are allocated based on the budget of each program to the total of all the budgets.

COST ITEM DESCRIPTION	ALLOCATION POOL CODES		ALLOCATION METHOD	ALLOCATED %	ELEMENT ALLOCATED COST SHARE	
	PROJECT COD	ELEMENT CODES	Fixed Cost Line Item			
52900 - Printing Corp	34020	340620	\$0.00	0.00%	\$ -	
		341920	\$4,000.00	7.38%	\$ 369.00	
				0.00%	\$ -	
				0.00%	\$ -	
	35020	350620	\$0.00	0.00%	\$ -	
		351920	\$13,000.00	23.99%	\$ 1,199.26	
	36120	502020	\$ -	0.00%	\$ -	
				0.00%	\$ -	
	36220	501020	\$ 21,000.00	38.75%	\$ 1,937.27	
		501120	\$ 12,000.00	22.14%	\$ 1,107.01	
	36520	365020	\$ 3,000.00	5.54%	\$ 276.75	
		365120	\$ 1,200.00	2.21%	\$ 110.70	
	36319	507218	\$ -	0.00%	\$ -	
	<b>TOTAL</b>			<b>\$54,200.00</b>	<b>100.00%</b>	<b>\$ 5,000.00</b>
	INVOICE AMOUNT					5,000.00





**Example 7: Automobile Insurance=35,449.20**

Automobile insurance allocated based on insured value to the total insured value of all programs. Each vehicle is charged based to the program it is used in.

COST ITEM DESCRIPTION	ALLOCATION POOL CODES		ALLOCATION METHOD	ALLOCATED %	ELEMENT ALLOCATED	Monthly Accrual
	PROJECT CODES	ELEMENT CODES				
54000 - Insurance - Automobile		Vehicle Description	Insured Value		COST SHARE	Allocation
	35019					
		350620 2015 Bluebird	\$67,000.00	14.86%	\$ 5,267.12	
		350620 2018 Flex	\$30,000.00	6.65%	\$ 2,358.41	
		350620 2017 Bluebird	<b>\$94,589.00</b>	20.98%	\$ 7,435.99	
		350620 2010 Bluebird	\$92,144.00	20.43%	\$ 7,243.78	
		350620 2017 Ford Edge	\$33,890.00	7.52%	\$ 2,664.22	
		350620 Food Vehicles (See Below)	Based on Budget	89.00%	\$ 4,779.11	2,479.05
	34019			0.00%	\$ -	
		340620 2019 Flex	\$30,000.00	6.65%	\$ 2,358.41	
		340620 Food Vehicles (See Below)	Based on Budget	11.00%	\$ 990.68	245.76
		Allocated to HS/EHS 2017 Ford Transit Connect	\$23,753.00	5.27%	\$ 1,867.31	
		Allocated to HS/EHS 2017 Ford Transit Connect	\$23,753.00	5.27%	\$ 1,867.31	
		Allocated to HS/EHS 2010 Ford Van	\$20,800.00	4.61%	\$ 1,635.17	
	39900	999507 2018 Ford Edge	\$35,000.00	7.76%	\$ 2,751.48	229.29
<b>TOTAL</b>			<b>450,929.00</b>	<b>200.00%</b>	<b>\$ 40,818.99</b>	<b>2,954.10</b>
INVOICE AMOUNT			35,449.20		2,954.10	

**Example 8: Telephone= \$5,000**

Telephone costs allocated based on budget of each program to the total of each program.

COST ITEM DESCRIPTION	ALLOCATION POOL CODES		ALLOCATION METHOD	ALLOCATED %	ELEMENT ALLOCATED
	PROJECT CODE	ELEMENT CODES			
53600 - Telephone		Fixed Cost Line Item			COST SHARE
Corp	34020	340620	\$22,800.00	11.42%	\$ 571.14
		341920	\$1,200.00	0.60%	\$ 30.06
	31020	100020	\$3,000.00	1.50%	\$ 75.15
				0.00%	\$ -
	35020	350620	\$40,850.00	20.47%	\$ 1,023.30
		351920	\$2,150.00	1.08%	\$ 53.86
	36120	502019		0.00%	\$ -
		502119	\$0.00	0.00%	\$ -
	36219	501020	\$48,000.00	24.05%	\$ 1,202.40
		501120	\$48,000.00	24.05%	\$ 1,202.40
	36520	365020	\$30,000.00	15.03%	\$ 751.50
		365120	\$3,600.00	1.80%	\$ 90.18
<b>TOTAL</b>			<b>\$199,600.00</b>	<b>100.00%</b>	<b>\$ 5,000.00</b>
INVOICE AMOUNT					\$5,000.00

Example 9: Training= \$5,000

Training costs allocated based on budget of each program to the total of each program.

COST ITEM DESCRIPTION	ALLOCATION POOL CODES		ALLOCATION METHOD	ALLOCATED %	ELEMENT ALLOCATED
	PROJECT CODE	ELEMENT CODES			
55000- Training			Fixed Cost Line Item		COST SHARE
Agencywide	34020	340320	\$49,369.00	29.06%	\$ 1,452.82
				0.00%	\$ -
	31020	100020	\$0.00	0.00%	\$ -
		200020	\$0.00	0.00%	\$ -
	35020	350320	\$65,688.00	38.66%	\$ 1,933.06
				0.00%	\$ -
	36220	501020	\$6,000.00	3.53%	\$ 176.57
		501120	\$750.00	0.44%	\$ 22.07
	36520	365020	\$30,500.00	17.95%	\$ 897.55
		365120	\$17,600.00	10.36%	\$ 517.93
36319	507219		0.00%	\$ -	
<b>TOTAL</b>			\$169,907.00	100.00%	\$ 5,000.00
INVOICE AMOUNT				\$	5,000.00

Helping People. Changing Lives.



The Agricultural and  
Labor Program, Inc.

*community*  
**Action**  
PARTNERSHIP  
America's Poverty Fighting Network

# *Annual Corporate Meeting and Luncheon*

2026  
2025  
2024  
2023  
**2022**

True to Our Mission ... Forging a New Direction During the Pandemic.

Saturday, January 22, 2022 | 12:00 p.m.

B Resort and Spa  
1905 Hotel Plaza Blvd.  
Lake Buena Vista, FL 32830

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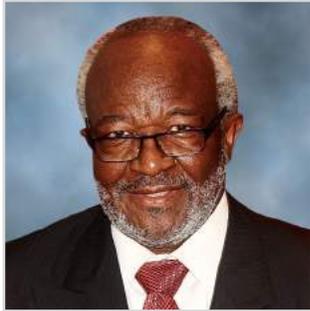
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# Message From the Board Chair



On behalf of the ALPI Board of Directors, welcome to The Agricultural Labor Program Inc., Annual Corporate Meeting and Luncheon, celebrating 54 years of public service. This amazing organization has been the catalyst for sustaining and changing the lives of hundreds of thousands of individuals, children, families and farmworkers throughout the State of Florida. Today marks another milestone heading into an uncertain future, with the pandemic presently looming, as a constant reminder of potential future disruptions in the workplace. As the stewards of this corporation, we have the obligation of ensuring that ALPI's CEO has the necessary tools to prepare for the unexpected, in order to be able to protect staff and the general public.

During these times, it's imperative that the board remains proactive and up to date on all mandates (via CEO) submitted by CDC, Office of Head Start, Region IV, and Local and State regulations. Following these guidelines, allows the leaders to prepare to be in a "high alert" risk management "attack mode" to minimize workplace layoffs and closings, and ready to adapt to unforeseen issues that may be created by this pandemic. With all of the changes and adjustments made, the organizations alignments reflect our theme: **True to Our Mission ... Forging a New Direction During the Pandemic.**

The ALPI organization's management is operating under delicate conditions, having to balance these workplace issues, while still being able to garner additional funding. The CEO secured an additional seven million dollars (\$7,000,000) this program year and our audit was just completed. Our audit resulted in no material weakness or findings, and ALPI achieved a low risk auditee designation, demonstrating ALPI's efficient management of its resources, only 5% of each dollar went into management. This governing body is led by a select group of business champions, who have accepted their role as a progressive body of individuals, destined to make a difference in the lives of those that live in poverty.

To our Corporate Members, Friends, Staff, Community Leaders ... thank you for your support and for coming! To our CEO, your leadership has demonstrated your worth, and commitment to the success of the organization. And finally to the Board of Directors, there is no other governing body of dedicated individuals that can match your performance, thank you for being the best of the best!

Thank you all for attending.

Sincerely,

A handwritten signature in black ink that reads "William Holt". The signature is written in a cursive style.

William Holt, Chairperson  
ALPI Board of Directors

# Message From the CEO



Welcome to our 54<sup>th</sup> Anniversary.

Despite the pandemic, I am here to report that the corporate affairs of the Agricultural and Labor Program, Inc. is operating effectively and efficiently and adhering to Federal, State and Local regulations. Thank you to Chairman Holt and this high functioning Board of Directors for their support. We are able to move this organization to higher levels because they are strong, experienced, knowledgeable, and the key to the success of this great organization. Our success is due to their roles as leaders who understands the difference between governance and management.

As survivors of the pandemic and having to facilitate in this type of atmosphere, it is imperative to act swiftly, decisively and at times without much notice, in order to adapt to the ever-changing mandates received Federal and State Government. ALPI's New Five (5) Year Strategic Plan and Re-Alignment has allowed me to focus on the future of ALPI and the direction that we must take to continue to work for those with less and make every effort to ensure our customers sustain and become self-sufficient. Poverty is what community action represents and as CEO, my job is to ensure that those disadvantaged, disenfranchised individuals, children, and families have the lifeline that is designed to assist them to prosper and become assets in the community, as *we are dedicated to helping people help themselves and each other.*

The Pandemic is a constant interruption to us all, especially those living in poverty who are witnesses to the greatest hardship due to their living conditions and we are totally passionate on being the support system that delivers the much-needed benefits that define their lives. As CEO, I will continue to work with this great staff to create better living conditions and lift up those who require more during these uncertain times, and we will do whatever it takes to afford every client a better life. *True to our Mission...Forging a New Direction during the Pandemic.*

In closing, I would like to thank my staff, our friends, stakeholders, elected officials, community leaders, and others for attending. Last, but most importantly the ALPI Board of Directors for their dedication to excellence and support, without you there would not be an ALPI. Thank you for attending!

Regards,

A handwritten signature in black ink, appearing to read 'Arlene'.

Arlene Dobison, CCAP, NCRI, HDFP  
ALPI Chief Executive Officer

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# Proclamations & Greetings

## PROCLAMATION

City of Auburndale  
State of Florida

### IN HONOR OF THE 54<sup>th</sup> ANNIVERSARY OF THE AGRICULTURAL AND LABOR PROGRAM, INC.

**WHEREAS**, The Agricultural and Labor Program, Inc. (ALPI) is a private, non-profit, community based organization that has been helping people and changing lives since 1968;

**WHEREAS**, The theme for the 54<sup>th</sup> Annual Corporate Meeting is "True to Our Mission... Forging a New Direction During the Pandemic".

**WHEREAS**, The ALPI provides community services that make a profound and lasting difference in the lives of children, families, and farmworkers including: Head Start/Early Head Start and Child Development Services;

**WHEREAS**, In 2021, ALPI provided the Auburndale area and Polk County with Energy Assistance, Child and Family Development, Elderly Home Energy Assistance, Affordable Housing, Employment Support Services, and their Child Care Food Program; and

**WHEREAS**, The Agricultural and Labor Program Inc. continues to help the socially and economically disadvantaged children and families achieve and maintain family stability and economic self-sufficiency.

**NOW, THEREFORE**, I Dorothea Taylor Bogert by virtue of the authority vested in me as Mayor, do hereby proclaim January 22, 2022, as:

### THE AGRICULTURAL AND LABOR PROGRAM, INC. 54<sup>th</sup> ANNIVERSARY

in Auburndale, Florida in recognition and appreciation of the services provided by the

IN WITNESS WHEREOF, I have hereunto set my hand and caused the Seal of the City of Auburndale to be affixed this 20<sup>th</sup> day of December, A.D., 2021.

  
Dorothea Taylor Bogert, Mayor



## Proclamation

**WHEREAS**, the Agricultural and Labor Program, Inc. is a direct descendant of The Agricultural and Labor Project, established in 1968, by The Coca-Cola Company to improve the quality of life for farm workers in their Florida citrus operations; and

**WHEREAS**, in 2021, the organization provided a constant flow of community support services and made a profound and lasting difference in the lives of our local children, families, and farmworkers.

- > **Energy Assistance:** 14,293 families were served
- > **Child and Family Development:** 826 children enrolled, and 30 families received job training.
- > **Elderly Home Energy Assistance Program:** 828 seniors received energy assistance.
- > **Housing:** 57 affordable housing units were successfully maintained.
- > **Child Care Food Program:** 219,520 meals were served.
- > **Employment Support:** 16 adults received employment support and 10 received vocational training.

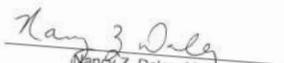
**WHEREAS**, the theme for the 54<sup>th</sup> Annual Corporate Meeting and Luncheon is "True to Our Mission... Forging a New Direction During the Pandemic"; and

**WHEREAS**, the Agricultural and Labor Program, Inc. has consistently placed a high priority on local partnerships and collaboration efforts to better maximize the use of limited federal, state, and local resources and the City of Lake Alfred is proud of its community efforts.

**Now**, therefore BE IT PROCLAIMED the City of Lake Alfred supports the 54<sup>th</sup> Annual Corporate Luncheon on January 22, 2022, and encourages all citizens to honor, recognize, and support the services provided by the Agricultural and Labor Program to our community.

IN WITNESS WHEREOF, I have hereunto set my hand this 10<sup>th</sup> day of January 2022.



  
Nancy Z. Daley, Mayor  
City of Lake Alfred, Florida

# Proclamations & Greetings



December 14, 2021

Ms. Arlene Dobison  
Chief Executive Officer  
The Agricultural and Labor Program, Inc.  
300 Lynchburg Road  
Lake Alfred, FL 33850

Dear Ms. Dobison:

On behalf of the City of Bartow, it is my pleasure to acknowledge the 54 years of service provided by the Agricultural and Labor Program, Inc. to the most vulnerable of our county's citizens ... migrant farmworkers and low-income citizens.

The services you provide, in "helping people to help themselves" and your dedication to the citizens of the Bartow community is greatly appreciated.

Congratulations to you on the many achievements of the Agricultural and Labor Program, Inc. and best wishes for a successful 2022 Annual Meeting and Luncheon!

City of Bartow, Florida

Vice Mayor Steve Githens

450 North Wilson Avenue • P.O. Box 1069 • Bartow, Florida 33831 • (863) 534-0100



Dr. Martha Santiago, Chair  
Commissioner, District 4

Board of County Commissioners

December 15, 2021

330 W Church Street  
Drawer BC01  
P O Box 9005  
Dr. Bartow, FL 33631-9005  
Tel: (863) 534-6422  
Fax: (863) 534-7656  
[MarthaSantiago@polk-county.net](mailto:MarthaSantiago@polk-county.net)

Arlene Dobison, CCAP, NCRI  
Chief Executive Officer  
The Agricultural and Labor Program, Inc.  
300 Lynchburg Road  
Lake Alfred, FL 33850

Dear Ms. Dobison,

On behalf of the Polk County Board of County Commissioners, I thank you for your commitment to serve the children and families in our community. Thank you for embracing the diversity of our county and empowering people to achieve a greater life.

ALPI is a tremendous asset to the county's workforce, education, economic development, and standard of living. You change lives and we are forever grateful for your service.

The Polk County Board of County Commissioners fully supports and applauds ALPI's mission and outreach in our community.

Best wishes during your 54<sup>th</sup> Annual Meeting and for the coming year.

Sincerely,

Dr. Martha Santiago, Chair  
County Commissioner, District 4

Equal Opportunity Employer

# Proclamations & Greetings



H. WILLIAM MUTZ  
MAYOR

January 22, 2022

Arlene Dobison, Chief Executive Officer  
The Agricultural and Labor Program, Inc.  
300 Lynchburg Road  
Lake Alfred, FL 33850-2576

Dear Ms. Dobison:

As Mayor of the City of Lakeland, and on behalf of my colleagues on the City Commission, I would like to affirm our support of the mission and guiding principles of the Agricultural and Labor Program, Inc. (ALPI).

The City of Lakeland believes ALPI is an integral component to improving the quality of life for the children and families of our community. Your advocacy and program delivery role are to be commended as we encourage you to look for ways to continuously improve, while engaging the broader community to assist you in your efforts.

Congratulations to you on the many achievements of ALPI and best wishes for a successful 2022 Annual Meeting!

Best wishes to you all.

  
H. William Mutz  
Mayor



*City of Naples*

TERESA LEE HEITMANN  
MAYOR

## PROCLAMATION

The Agricultural and Labor Program, Inc. (ALPI), headquartered in Lake Alfred, Florida, is an IRS certified 501(c)(3) private, nonprofit organization whose Mission is to collaborate with community partners and deliver human service programs that empower the economically disadvantaged and others to be self-sufficient; in service areas including Collier, Glades, Hendry, Highlands, Martin, Polk, St. Lucie, and Volusia Counties; and

**WHEREAS** the underlying principles that guide ALPI activities are involvement of people; emphasis on long-term accomplishments rather than promises; assurances of economic viability; emphasis on self-help; and a sound, integrated, total systems approach over five main areas of activity, including: 1. Employment and Income; 2. Organization Development and Support; 3. Housing; 4. Community Relations and Support; 5. Health, Education, and Social Services; and

**WHEREAS** in 2020-2021, the need of children, families, and elders were addressed through programs such as Community Services Block Grant; Farmworker Emergency Assistance; Head Start/Early Head Start and School Readiness Opportunities Child Care Food and Nutrition Services; HUD Housing Counseling; LIHEAP Services (Low Income Home Emergency Assistance Program); and

**WHEREAS** The ALPI 54<sup>th</sup> Annual Corporate Meeting and Luncheon is being held Saturday, January 22, 2022, celebrating 54 years of community service, "True to Our Mission...Forging a New Direction During the Pandemic."

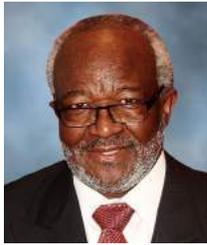
**NOW, THEREFORE**, I, Teresa Heitmann, by virtue of the authority vested in me as Mayor of the City of Naples, Florida, do hereby proclaim gratitude and support to the Agricultural and Labor Program, Inc., for its compassionate and well-organized delivery of services to provide and empower children, families, farmworkers and elders with dignity and accomplishment.

**IN WITNESS THEREOF**, I have hereunto set my hand this 11th day of January 2022.

  
Teresa Heitmann, MAYOR

730 EIGHTH STREET SOUTH - NAPLES, FLORIDA 34102  
TELEPHONE (239) 275-1000 FAX (239) 275-1019 CELL (239) 321-0800  
EMAIL: theitmann@naplesgov.com

# 2021 Board of Directors



**William Holt, Board Chairperson**  
Advisory Council Designee  
Eastern Regional Advisory  
Council - Chairperson



**Stacy Campbell-Domneck**  
Board Vice Chairperson  
Private Sector Designee  
CareerSource Polk, CEO



**Shella Dixon, Board Secretary**  
Public Sector Designee for  
Commissioner Kerry Wiggins, Sr.  
City of Sanford, FL



**Patricia Gamble, Board Treasurer**  
Private Sector Designee  
FL Department of Revenue  
Tax Specialist I



**Katie Clarke, Board Member**  
Private Sector Designee  
Lakeview Park Homeowner  
Association, President



**Marjorie Gaskin, Board Member**  
Public Sector Designee for  
Commissioner Rufus Alexander  
City of Ft. Pierce, FL



**Annie Robinson, Board Member**  
Low Income Sector Designee  
Southern Regional Advisory  
Council Member



**Brenda Gray, Board Member**  
Public Sector Designee  
Deputy Mayor  
City of Avon Park, FL



**Josephine Howard, Board Secretary**  
Public Sector Designee for  
Mayor Morris West  
City of Haines City, FL



**Kim Johnson, Board Member**  
Public Sector Designee  
Commissioner  
St. Lucie County BoCC



**Annette Jones**  
Low Income Sector Designee  
Southern Regional Advisory  
Council Member



**Glenda Jones, Board Member**  
Private Sector Designee  
Winter Haven Neighborhood  
Service Ctr. - Executive Director



**N'Kosi Jones, Board Member**  
Low Income Sector Designee  
Southern Regional Advisory Council



**Chester McNorton, Board Member**  
Low Income Sector Designee  
ATEC Advisory Council Member



**Melvin Philpot, Board Member**  
Private Sector Designee  
Progress Energy Florida  
Duke Energy Program Manager



**Yolanda Robinson, Board Member**  
Low Income Sector Designee  
Head Start/Early Head Start  
Policy Council



**Tonmiel Rodriguez, Esq.**  
Private Sector Designee  
Tonmiel Rodriguez Law Firm, PA



**Rashondra Croskey, Board Member**  
Public Sector Designee for  
Commissioner Timothy Stanley  
Glades County BoCC



**Emily Hunter**  
Public Sector Designee for  
Commissioner Emma Byrd  
Henry County BoCC



**David Rucker, Board Member**  
Low Income Sector Designee  
Northern Regional Advisory Council



**Ruby Willix, Board Member**  
Low Income Sector Designee  
Central Regional Advisory  
Council Member

## BUSINESS MEETING

### AGENDA

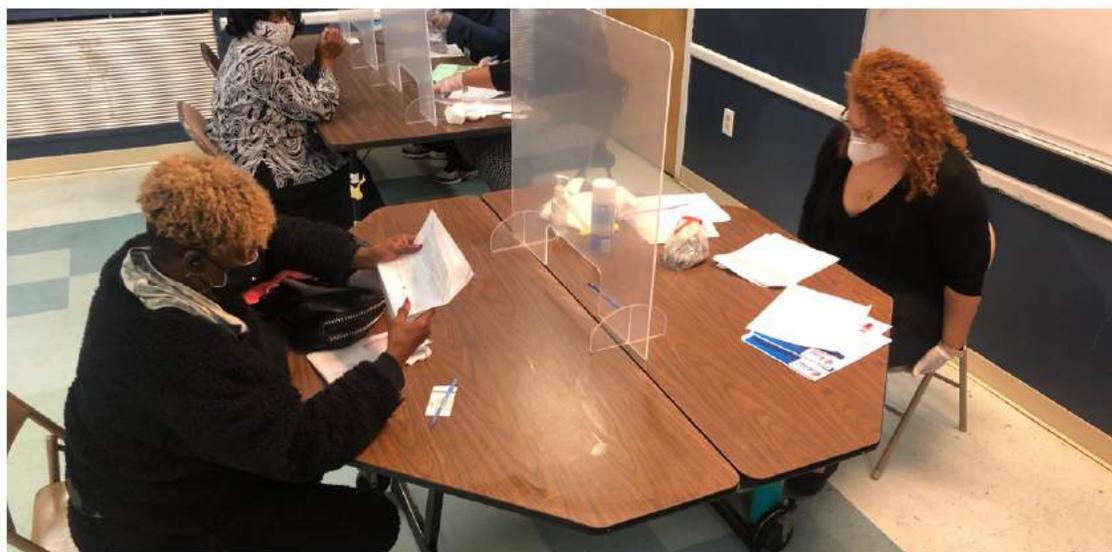
Saturday, January 22, 2022 | 11:00 a.m.

- |       |  |   |
|-------|--|---|
| I.    | Call to Order  | William Holt, Board Chairperson   |
| II.   | Words of Inspiration                                     | Stacy Campbell-Domineck, Board Vice Chairperson                               |
| III.  | Acknowledgements<br>Regional Advisory/Policy Council     | Arlene Dobison, CEO   |
| IV.   | Adoption of Minutes                                      | Yolanda Robinson, Board Secretary   |
| V.    | Annual Financial Report                                  | Marjorie Gaskin, Board Treasurer  |
| VI.   | 2021 Annual Report                                       | Tonmiel Rodriguez, Esq., Board Member<br><i>On behalf of the Board Chair.</i> |
| VII.  | New Business:<br>Introduction of 2022 Board of Directors | Arlene Dobison, CEO   |
| VIII. | Adjournment  | William Holt, Board Chairperson   |

# Accomplishments & Opportunities

During the 2020-2021 program year, The Agricultural and Labor Program, Inc. (ALPI) continued to work in partnership with communities in a coordinated and comprehensive manner to develop programs and deliver optimum services to continue making a critical difference in the lives of people in need. ALPI, like many community action agencies, is grounded in helping families and communities build this social capital for movement to self-sufficiency. ACCOMPLISHMENTS & OPPORTUNITIES included in this year's Annual Report continue to validate the organization's positive outcomes as demonstrated in the following CSBG Organizational Standards Center of Excellence (COE) focus areas:

- Maximum Feasible Participation
- Vision and Direction
- Operations and Accountability



## FOCUS AREA: Maximum Feasible Participation

### Upward Mobility

Providing training, career development and growth opportunities for staff, in order to create a work culture of advancement and retention, while effectively utilizing personnel resources.

ALPI's Chief Executive Officer, Arlene Dobison, successfully recertified as a Certified Community Action Professional. CCAP's are individuals who exemplify commitment to Community Action and changing the lives of the disadvantaged and disenfranchised. Ms. Dobison also received her certification as a NCRI, National Certified ROMA Implementer.



The *Family Development Credential Program* provides frontline workers with the knowledge and skills they need to coach families to set and reach their own goals for healthy self-reliance in their communities. To earn the FDC, front-line workers take 90 hours of classes based on Empowerment Skills for Family Workers, complete a portfolio documenting their ability to apply these concepts and skills, and pass a standardized exam. Congratulations to Amy Nunez, April McCrary, Margie Houston, Karla Toole, Cindy Thomas, Jewel Whitehead, Juanita Deleora, Rhonda McBride, Kelcey Williams, Cynthia Thomas, Anna Williams-Holmes and Lisandra Concepcion. Job well done!



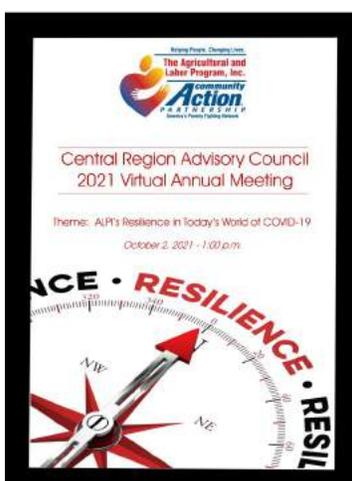
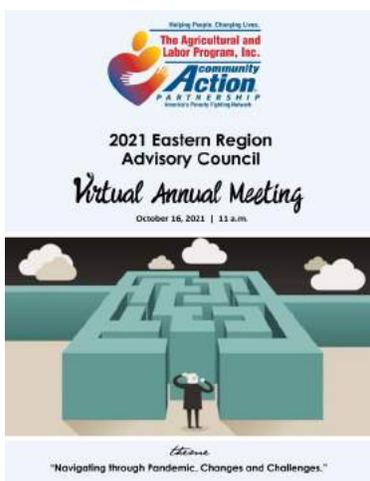
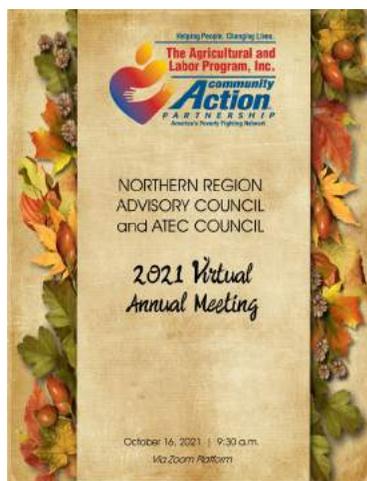
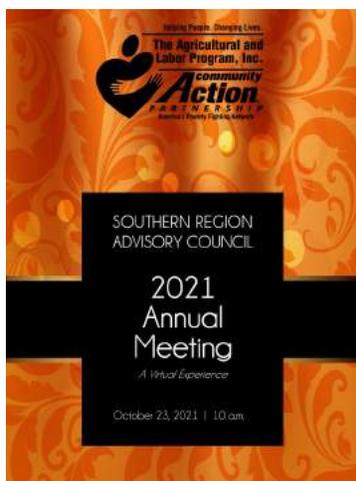
# Accomplishments & Opportunities

## FOCUS AREA: Maximum Feasible Participation

### Consumer Input and Involvement

Consumer Input and Involvement Community Action is rooted in the belief that people with low incomes are in the best position to express what they need to make a difference in their lives.

During the 2020-2021 program year, ALPI worked in partnership with people and communities via its Regional Advisory Councils and Head Start Policy Council. ALPI worked in a coordinated and comprehensive manner to develop programs and services in order to make a critical difference in the lives of families and farmworkers. Individuals and families were afforded opportunities to identify and share their needs and thus, enabled the organization to enhance its abilities to continue the implementation of high impact programs and services.



## FOCUS AREA: Maximum Feasible Participation

### Community Engagement

ALPI, like many other CSBG eligible entities, cannot meet all of a community's needs independently. However, through many established formal and informal partnerships, ongoing community planning, advocacy, engagement of people with low incomes, faith-based organizations, educational institutions, government and businesses, ALPI works together with other Community Action Agencies and CSBG eligible entities to move families up the self-sufficiency ladder and revitalize communities.

Between 2013 and 2021, ALPI partnered with more than 351 different organizations, including, but not limited, to the following.

LP Housing Development Corporation  
Area Agency on Aging  
Bank of America  
Big Brothers/Big Sisters of Highlands County  
Boys and Girls Club of Lakeland  
CareerSource Polk  
Center for Independent Living of Florida  
Children's Services Council of St. Lucie County  
Coalition of Florida Farmworkers Organizations  
School Boards of Polk and St. Lucie Counties  
Early Learning Coalitions of Polk and St. Lucie Counties

Florida Non-Profit Housing (FNPH)  
Goodwill Industries of Southwest Florida  
Heartland Homeless Coalition  
Lakeview Park Homeowners Association  
Macedonia Baptist Church of Naples  
New Bethel AME  
Polk County Government  
Salvation Army  
United Way  
Wells Fargo Bank  
Women's Resource Center of Winter Haven



## FOCUS AREA: Maximum Feasible Participation

### Regional Advisory Councils

#### Central Region Advisory Council

Even with the pandemic, CRAC members remained very active in participating via virtual meetings. CRAC was able to select two (2) scholarship recipients. CRAC members continue to share resources and provide valuable and relevant information to their communities. This year's Arabell Wiggings Scholarship recipients were: Ms. Samia Driver (Florida State University) and Ms. McKayla McDonald (Florida State University). The pandemic caused the annual meeting to be held virtually, via Zoom, on Saturday, October 2, 2021, at 1:00 p.m. The Nominating Committee filled the vacant Treasurer position with Ms. Margaree Simon. The Membership Committee ensured compliance with attendance detailed in policies and procedures. The Government Affairs Committee also discussed Virtual Learning, COVID-19, Involvement with NCAF, COVID Liability Protections, NHSA, NAEYC, and more.

#### Northern Region Advisory Council

NRAC had a busy year, in spite of the pandemic. Members participated at the virtual Annual Planning Retreat, on November 21, 2020; the virtual Annual Corporate Meeting and Luncheon, on January 23, 2021; the virtual Shared Governance Orientation, on February 27, 2021 and participated at the bi-monthly Board of Directors' Meetings. NRAC recommended AACCC organization, as the Community Service Award recipient. This organization distributes food to the needy in the Apopka, FL area. The Council reviewed and certified membership and meeting attendance, as well as corporate membership. Selected member (via ALPI) to represent the Northern Region - ATEC at affiliate agency virtual conference meeting: Florida Association for Community Action Agencies (FACA). Selected Ms. Imari Thomas, as the 2021 Marva Hawkins Scholarship Award recipient. Officers for 2020-2021 are, Donald Tillman, Chairperson, David Rucker, Vice Chairperson, Constance Anderson, Secretary, Shelia Dixon, Assistant Secretary, Evelyn Seabrook, Treasurer, and Nereida Jackson, Parliamentarian.

#### Eastern Region Advisory Council

ERAC received orientation training on Shared Governance and Strategic Planning with consultants Myers and Myers. The Board approved timelines were shared of upcoming events. The items discussed during meetings were fundraising activities, annual meeting and scholarships. The Council discussed the Annual meeting and assigned Bobby Byrd as the chairperson for that meeting. Submitted for Board approval for the fundraising activities to include the scholarships. The Council made a motion to give two recipients the Arie Lou Perkins scholarship in the amount of \$1000 each. The Council also selected the community recipient award, Pastor Vernon Shazier, of River of Life Church. The ALPI Annual Corporate Meeting was held via teleconference (Zoom). Many of the Eastern Region Advisory members were present during the annual event.

#### Southern Region Advisory Council

Many services were provided in the Council's service areas of: Frostproof, Avon Park, Sebring, Lake Placid, Lake Wales, Fort Meade, Wauchula, Clewiston, LaBelle, Moore Haven, Naples and Immokalee. The Southern Region Advisory Council held its Annual Meeting via Zoom on Saturday, October 23, 2021. The program was attended by corporate and staff members. Ms. Arlene Dobison, Chief Executive Officer, gave greetings. The election process was introduced by staff liaison, Cheryl Burnham. Corporate members were validated via the Corporate Membership Roster. Al Miller, Deputy Director, Community Services/Economic Development Division facilitated the 2021-2022 election process for the SRAC. Six (6) seats were filled for the 2021-2024 and one seat was filled for 2020-2023. The officers are as follows: Kimberly Ross, Chairperson, Yvette Wingate, Vice-Chairperson, Annie Robinson, Secretary and Noemi Cruz, Treasurer. Al Miller did the honors of installing the 2021-2022 Southern Region Advisory Council Members. The Southern Region Advisory Council welcomed two (2) new members who eagerly filled the vacant seats.

## Helping People ... Changing Lives

March 31, 2021

Dear Ms. Arlene Dobison,

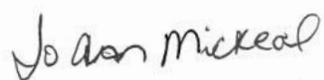
I would like to give a great big recognition to your Director Pa Houa Lee-Yang, for being such a professional, compassionate, and dedicated staff. I thought I was going to lose my family home. I decided to just walk-in to The Agricultural and Labor Program, Inc. (in tears) and see if anyone could assist me. Mrs. Lee-Yang came out to greet me and scheduled an appointment to meet with her to discuss my situation.

I came back to meet with Mrs. Lee-Yang at our scheduled appointment. Mrs. Lee-Yan reviewed the letter and packet from my loan mortgage server (JP Chase Morgan). I told Mrs. Lee-Yang that I have been paying this mortgage over 20 years and had only paid \$5,223.87 towards my principal. This was ridiculous; my interest rate was 16.25%. All this time, I have been paying interests only and nothing towards my principal. Mrs. Lee-Yang, advised me not to worry and she will talk to my mortgage loan server. Mrs. Lee-Yang did such an amazing and went the extra mile just to get me information that I requested from my relation manager, Mr. Garry Lee who had no answers and transferred me to several departments and they always sent me back to him. He would not respond back to me. She was able to help get me approved for a modification and loan assumption. With the approved modification and loan assumption, my interest rate dropped significantly, from 16.25% to 2.75%.

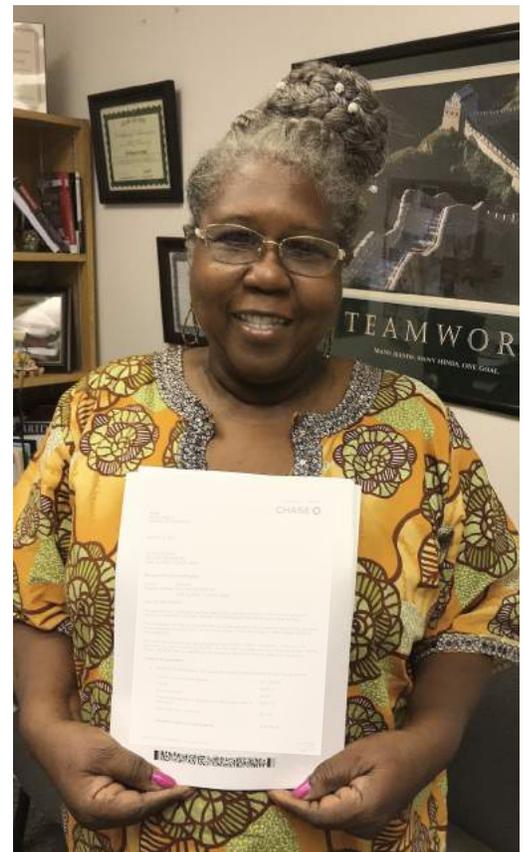
You just do not know how thankful and blessed I have been to come to ALPI to receive HUD counseling assistance by Mrs. Lee-Yang. She is my saving grace, and that is not a joke!

I cannot thank Mrs. Lee-Yang enough; I truly appreciate her efforts, her kindness and compassion.

Sincerely,



JoAnn Mickeal



# Accomplishments & Opportunities

## Pre-Cautionary Measures: COVID-19 Bio-Hazard Cleaning, Sanitizing, Waxing of Floors



## IT Risk Assessment

ALPI's Risk Assessment Process consists of many moving parts. Critical failure solution is in place as two hosts running the virtual server, with a shared data array accessed by both. This solution is highly redundant and a failure would be measured in minutes, with a potential loss of data of a mere 30 minutes of operating time. All disks, controllers, power supplies, and I/O channels are also redundant. Daily backups are part of a potent backup system, with three (3) levels of redundancy via a Nimble device, a Synology device, and the cloud. A robust SG230 Firewall with Email, Network, Web, and Wireless Protection is in place, serving as a giant net of overall protection. Remote locations use Sophos RED devices to connect to the main office servers, providing yet another additional level of protection. To ensure prevention of data theft via external devices, i.e. thumb-drives, external drives, etc., all USB port function has been disabled across the agency, meaning all usb ports, whether on thin-clients or pc's, are non-operable. Both offices not directly connected to the network and staff working remotely, via ALPI laptops, use an aggressive antivirus, as well as an integrated VPN. Agency laptops, used for remote work, are loaded with Prey Project, a super-stealth software tool, which is impossible to detect by the average user. Prey Project allows for the monitoring of device movement, location history, evidence reports for police, and full anti-theft actions, including remote file recovery, remote alarm, remote wipe, and full remote kill.



Sophos Server Protection Advanced serves as anti-ransomware protection. Sophos Endpoint Protection provides potent malware protection. ALPI has integrated Sophos encryption of sensitive email, through a fully automatic and transparent process. This policy-driven email encryption keeps message bodies and attachments secure, scanning for sensitive data before it leaves ALPI's network. Personal installation of ALPI email, via any application, i.e. for cell phones, tablets, etc., is permanently blocked. Installation attempts result in failure and generate an email warning to the administrator, along with the email account name, the type of device, etc. Dual internet modems allow for ISP redundancy, in that if one modem goes down, we can continue operating on one modem. Wireless access is highly restricted and behind the firewall, with only the CEO and IT in possession of passwords.

The ALPI Network Room is equipped with a stand-alone, dedicated, high wall-mounted a/c unit, completely independent of the building's a/c system. This setup was designed in the event the building's a/c system fails, the network room would continue at its set-point of 68°F, preventing sustained heat damage to the servers and other devices. Three (3) APC UPS battery backups exist on the network, capable of powering all devices running the network, until the system can automatically and seamlessly turn off every device, versus having everything shut off due to lack of power, which may cause hardware/software failure. All (3) APC UPS also possess environmental cards, which are able to monitor temperature, humidity and power fluctuations in the network room, as well as allow for remote access into all APC UPS devices, for management. Should temperature in the network room rise to a set-point or humidity is detected, due to a/c, power failure, or water leak, the APC UPS will begin the "safe" shutdown of all equipment, in order to mitigate server damage.

## Recognition: Commissioner N’Kosi Jones

### Bowling Green City Commissioner

On behalf of Chairman William Holt, CEO Arlene Dobison and ALPI Board of Directors, **Congratulations** to our newly elected Board Member, Mr. N’Kosi Jones.

He made history in Hardee County, on Monday, January 11, 2021, as the 1<sup>st</sup> African American elected and sworn in as a Bowling Green City Commissioner.

We are proud of him and know that he will be dedicated and committed to serving the people, because he is a man of empathy for his community.

A New Year, New Decade, New Opportunities and a New Leader for the people!

2021  
ELECTION

**VOTE**

**N'Kosi L.  
JONES**

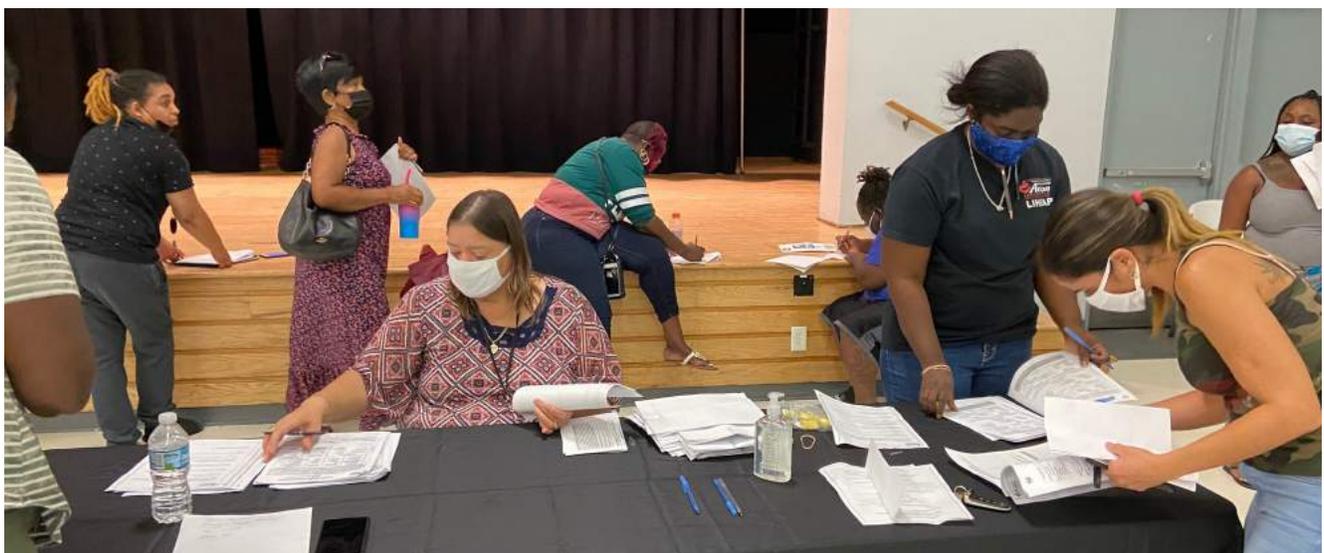
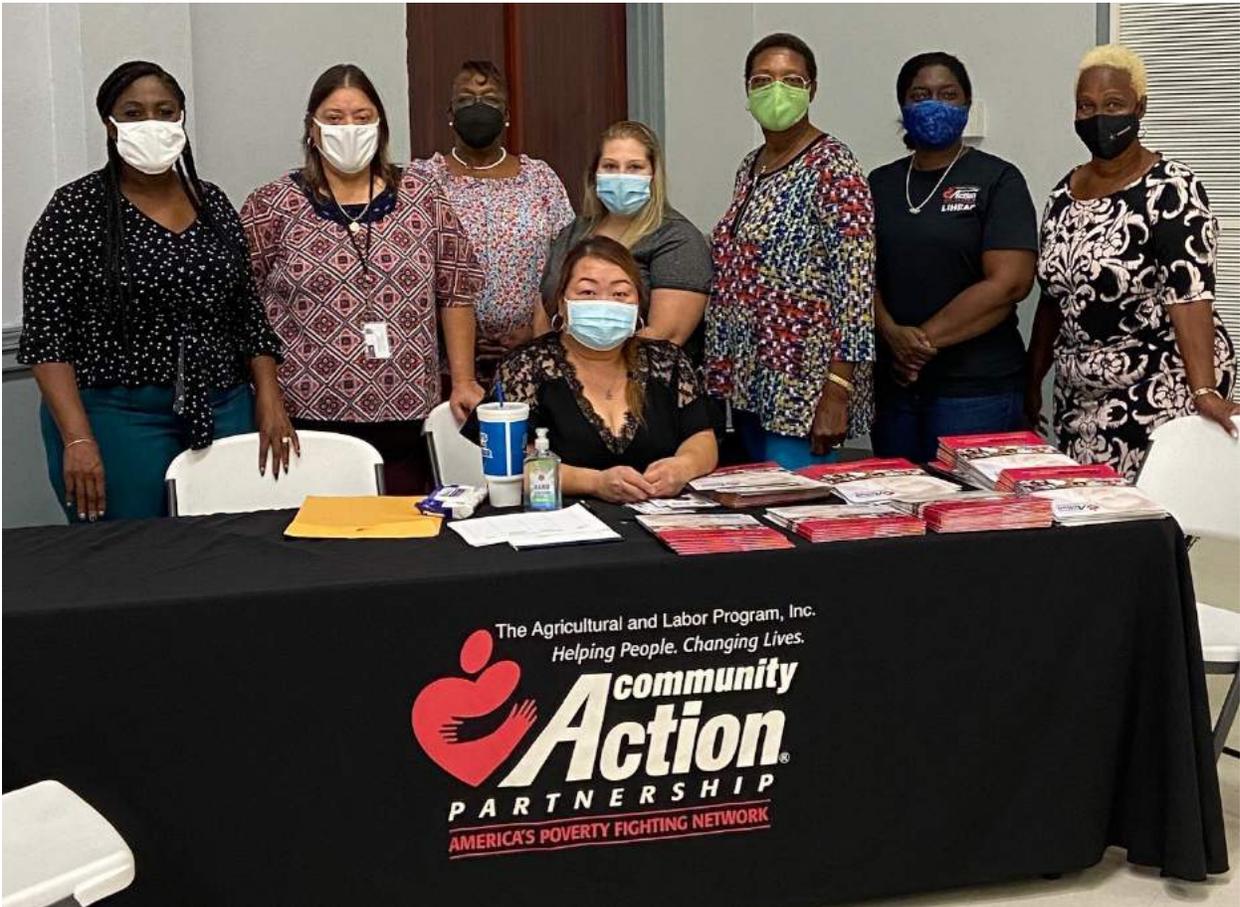
BOWLING GREEN  
CITY COMMISSIONER, SEAT 2  
JANUARY 5, 2021

"Sincerely Serving All Humanity..."

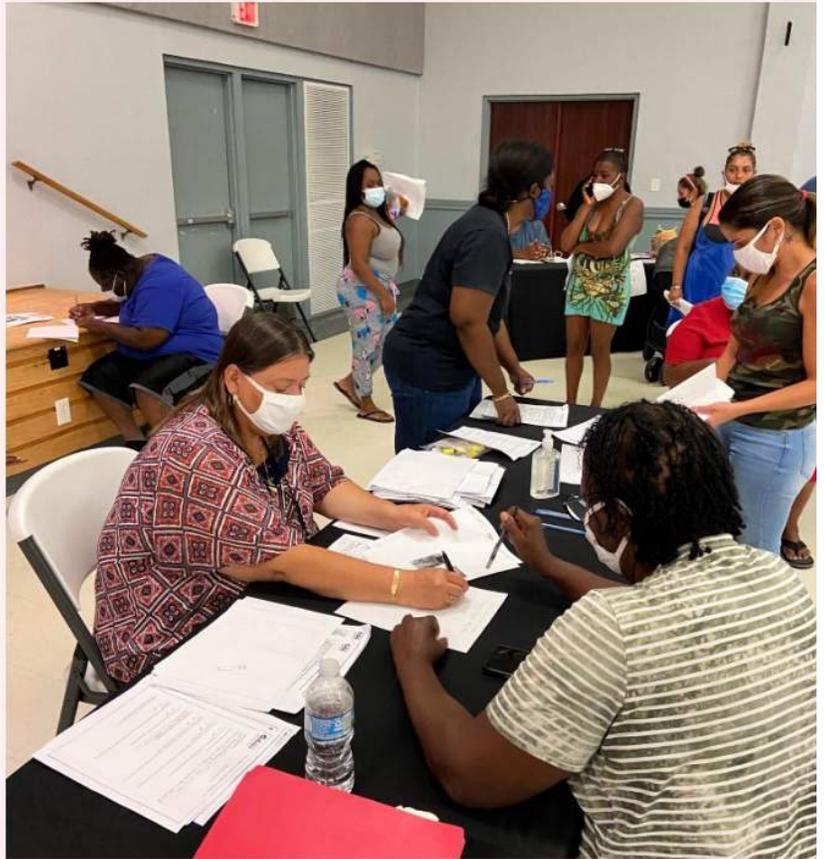
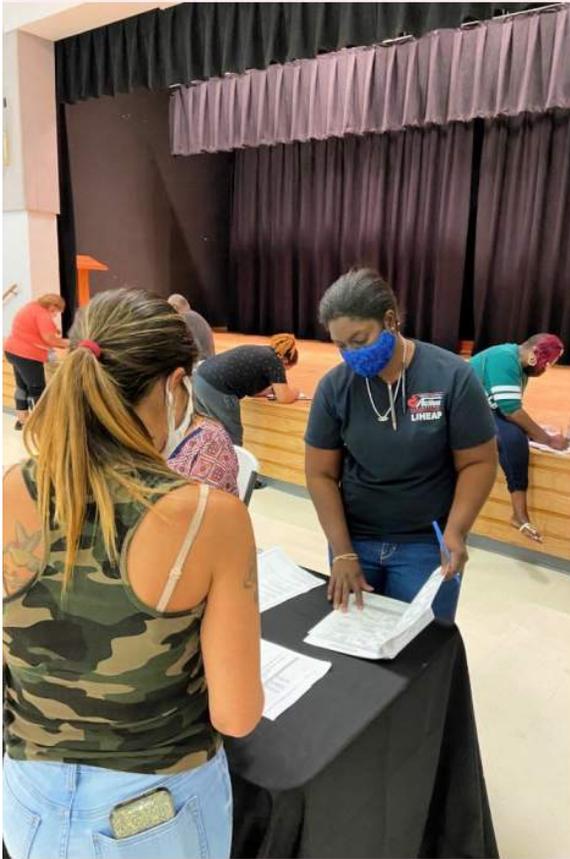
- ✓ Accountability
- ✓ Character
- ✓ Integrity
- ✓ Moral Values

Paid For and Approved By N'Kosi L. Jones,  
for Bowling Green City Commissioner, Seat 2  
nkosijones2021bgccs2@gmail.com

## ALPI In The Community



## ALPI In The Community



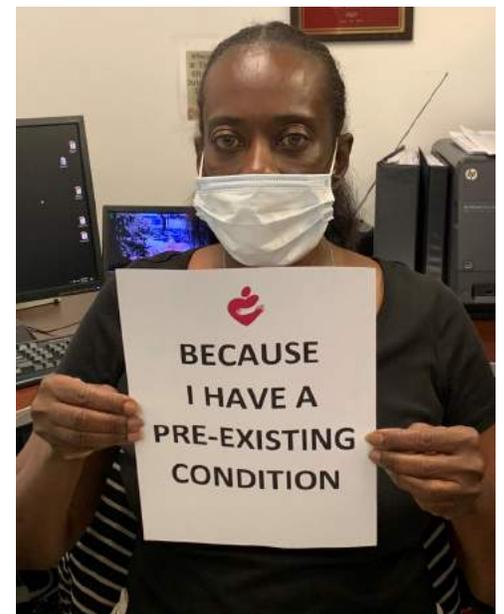
## ALPI In The Community



## ALPI In The Community



## ALPI STAFF SHARING WHY THEY GOT VACCINATED



## ALPI In The Community



# Accomplishments & Opportunities

## ALPI In The Community



## ALPI In The Community



## ALPI In The Community



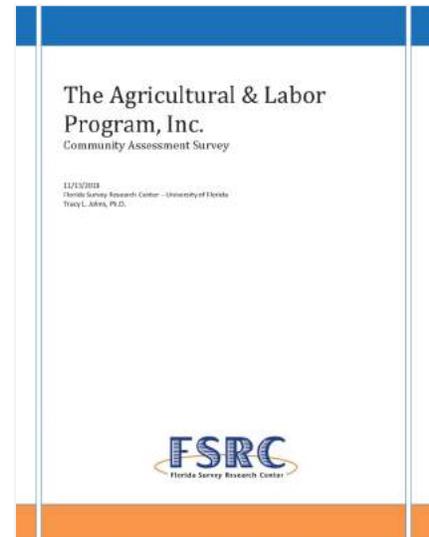
## FOCUS AREA: Maximum Feasible Participation

### Community Assessment

Local control of Federal CSBG resources is predicated on regular comprehensive community assessments that take into account the breadth of community needs, as well as the partners and resources available in a community to meet those needs. Regular assessment of needs and resources at the community level is the foundation of Community Action and a vital management and leadership tool that is used across the organization and utilized by the community to set the course for both CSBG and all agency resources.

In 2018, the Agricultural and Labor Program, Inc. (ALPI) engaged the services of Florida Survey Research Center – University of Florida to assist ALPI in conducting a survey for the purpose of obtaining a better understanding of the changes, service needs, and demographic characteristics needed by its target population (low-income children, families, and farmworkers) throughout ALPI’s service areas. This included Polk, Highlands, St. Lucie, Indian River, Okeechobee, Martin, Volusia, Hillsborough, Palm Beach, Hendry, Glades, Collier, Orange, Seminole, and Hardee Counties. Two (2) surveys were completed – one with ALPI service recipients and the other with community organizations.

With the onset of the COVID-19 Pandemic (early 2020), it became obvious that the needs of ALPI’s target population would be severely impacted, although temporarily, and the population needs would shift for the duration of the pandemic. In ALPI’s effort to maintain a targeted response it conducted additional research into the impacts of the pandemic and updated its 2018 survey. The caused ALPI to primarily focus on emergency assistance; however, it also continued to address the social services and children’s needs of its population.



### REPORT: HIGHLIGHTS

#### Adult Services/Emergency Assistance

In the previous Annual Report, the largest unmet need was a “Home Ownership Program”; however, as a direct result of the pandemic, this need shifted to a significant larger number of households requiring emergency assistance for rent, utilities, housing, food, transportation, etc. Through the benefit of increased funding, ALPI increased its focus on emergency assistance to 60% for direct payments to vendors (i.e. landlords, mortgage holders, electric and utility companies, etc.) with 40% for the additional staff needed to deliver an, almost doubled, emergency assistance program. With the addition of newly hired staff, ALPI also attempted to increase job counseling and referral to job training, when available. Unfortunately, the continuation of the pandemic severely limited job opportunities for low-income individuals.

#### Social Services

ALPI continued to address the social service needs through the delivery of emergency assistance, as outlined above, along with a limited skills and job training program.

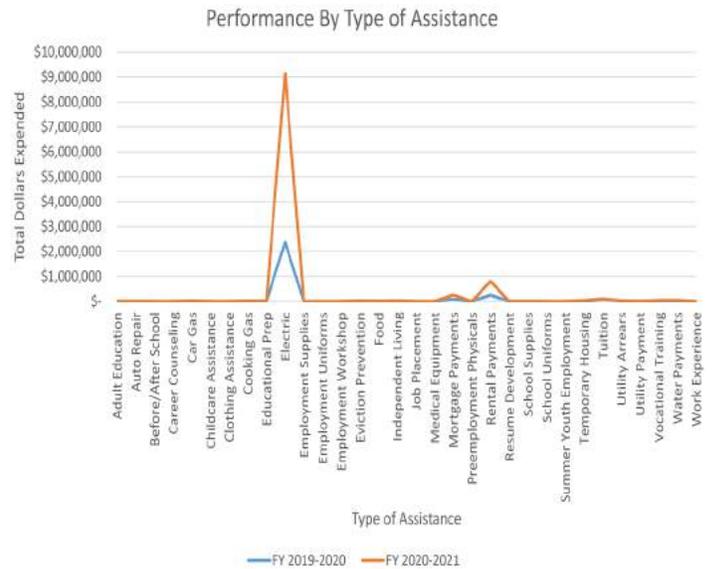
#### Children’s Services

Although impacted by the pandemic, ALPI also continued to address the needs of its children through the continuation of a modified program for its “Pre-kindergarten Programs” and “Head Start/Early Head Start”, both of which had been previously identified, in the 2018 survey, by 56.5% of its respondents.

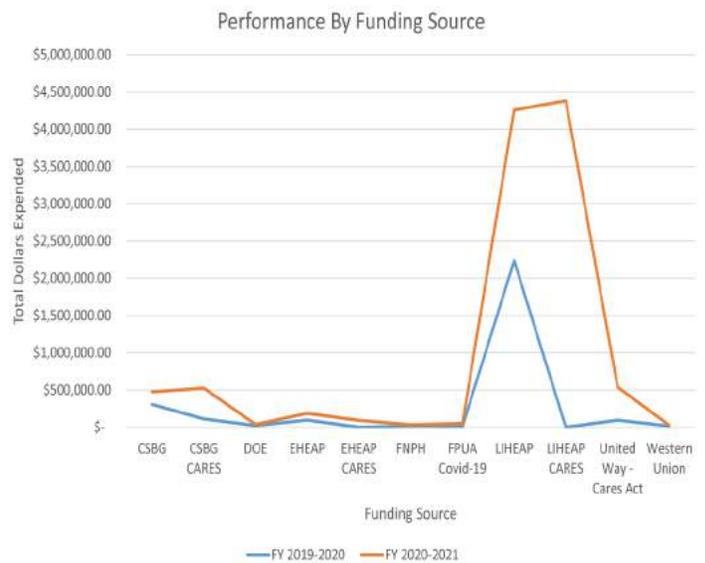
# Accomplishments & Opportunities

## Community & Economic Services Division

Type of Assistance	Performance by Type of Assistance FY 2019 to 2020		FY 2020 to 2021	
	Units of Service	Total Expended	Units of Service	Total Expended
Adult Education	5	\$ -	-	\$ -
Auto Repair	4	\$ 4,883.80	2	\$ 1,029.97
Before/After School	6	\$ -	6	\$ -
Career Counseling	-	\$ -	2	\$ -
Car Gas	265	\$ 16,456.98	152	\$ 10,675.00
Childcare Assistance	2	\$ 160.00	2	\$ 456.00
Clothing Assistance	-	\$ -	1	\$ 100.00
Cooking Gas	53	\$ 11,473.91	25	\$ 8,374.44
Educational Prep	20	\$ 9,400.10	13	\$ 8,136.33
Electric	7,395	\$ 2,367,561.17	15,443	\$ 6,771,378.95
Employment Supplies	6	\$ 1,259.13	3	\$ 163.33
Employment Uniforms	8	\$ 872.87	1	\$ 347.79
Employment Workshop	-	\$ -	1	\$ 560.00
Eviction Prevention	15	\$ 9,430.25	15	\$ 15,501.22
Food	78	\$ 6,275.00	77	\$ 6,250.00
Independent Living	22	\$ 13,123.17	7	\$ 11,100.00
Job Placement	9	\$ -	4	\$ -
Medical Equipment	1	\$ 900.00	-	\$ -
Mortgage Payments	65	\$ 82,533.71	113	\$ 177,824.34
Preemployment Physicals	10	\$ 1,067.00	6	\$ 785.00
Rental Payments	257	\$ 250,951.31	445	\$ 551,592.26
Resume Development	-	\$ -	1	\$ -
School Supplies	24	\$ 5,877.15	14	\$ 2,350.75
School Uniforms	7	\$ 817.95	3	\$ 530.02
Summer Youth Employment	1	\$ -	-	\$ -
Temporary Housing	-	\$ -	13	\$ 29,442.72
Tuition	29	\$ 64,486.28	23	\$ 35,289.92
Utility Arrears	84	\$ 17,136.95	33	\$ 8,542.16
Utility Payment	20	\$ 3,821.45	12	\$ 3,066.79
Vocational Training	24	\$ 21,997.70	11	\$ 18,397.32
Water Payments	54	\$ 11,014.33	105	\$ 35,631.31
Work Experience	1	\$ -	2	\$ 125.00
<b>TOTAL</b>	<b>8,465</b>	<b>\$ 2,901,500.21</b>	<b>16,535</b>	<b>\$ 7,697,650.62</b>



Funding Source	Performance by Funding Source FY 2019 to 2020		FY 2020 to 2021	
	Units of Service	Total Expended	Units of Service	Total Expended
CSBG	540	\$ 304,663.71	250	\$ 168,503.35
CSBG CARES	134	\$ 111,100.10	395	\$ 414,316.56
DOE	299	\$ 20,808.89	194	\$ 17,015.22
EHEAP	357	\$ 95,988.92	265	\$ 90,018.53
EHEAP CARES	-	\$ -	550	\$ 92,733.51
FNPH	70	\$ 15,881.00	73	\$ 16,745.08
FPUA Covid-19	32	\$ 9,799.30	141	\$ 40,367.86
LIHEAP	6,915	\$ 2,233,647.83	5,697	\$ 2,024,870.61
LIHEAP CARES	-	\$ -	8,586	\$ 4,380,835.62
United Way - Cares Act	107	\$ 94,080.06	377	\$ 443,315.38
Western Union	11	\$ 15,530.40	7	\$ 8,928.90
<b>TOTAL</b>	<b>8,465</b>	<b>\$ 2,901,500.21</b>	<b>16,535</b>	<b>\$ 7,697,650.62</b>



## FOCUS AREA: Vision and Direction

### Organizational Leadership

Community Action leadership is exemplified at all levels across the organization and starts with a mission that clarifies Community Action's work on poverty. A well-functioning board, and a focused chief executive officer/executive director, well-trained and dedicated staff and volunteers giving of themselves to help others will establish Community Action as the cornerstone and leverage point to address poverty across the community. Ensuring strong leadership, both for today and into the future, is critical.

#### Annual Board of Directors Retreat



The ALPI hosts its annual board management retreat to present board issues for discussion and approval agency-wide, if required. Board of Directors, Policy Council, CEO and Leadership team come together to assess prior year performance and upcoming goals. This retreat is to review strategic goals and address the performance and outcomes for the past program year.

The Board's assessment includes program planning; annual Financial Overview of Financial Position; Management Audit Findings and Recommendations; (draft) audit engagement proposal/timeline; Succession Plan Update; Risk Management; final closeout report, operating budget revisions; Workers Compensation assessment and Renewal; Fixed Assets and Property Improvement policy; Board Fundraising; fundraising activities; Board/Employee annual assessment; Review and/or revise Personnel Policies and Procedures.

#### Shared Governance Orientation

The purpose of the Shared Governance Orientation Session is to provide newly elected and experienced Board members, Head Start/EHS Policy Council Members and Regional Advisory Council Members with an overview of the agency's governance practices and regulatory requirements. The session ensures ongoing effective management oversight of the agency's governance practices by the Board of Directors and active participation in the decision-making process by the Head Start/EHS Policy Council and Regional Advisory Councils when applicable.

This formal Shared Governance Orientation session is the first step to ensure that board members, Head Start/EHS Policy Council Members, and Regional Advisory Council Members are active, engaged, educated, and ready to move forward collectively, in a participatory democracy, self-determined and in a genuinely shared governance partnership manner.



## FOCUS AREA: Operations and Accountability

### Board Governance

The Agricultural and Labor Program, Inc. (ALPI) Board, like many other community action boards, is uniquely structured to ensure maximum feasible participation by the entire community, including those the organization serves. The ALPI Community Action boards are comprised of at least 1/3 low-income individuals, 1/3 elected public officials (or their representative), and 1/3 private-sector. To make this structure work as intended, ALPI recruits board members thoughtfully, working within communities to promote opportunities for board service. We provide orientation and training, and support members in their oversight role. Boards are foundational to good organizational performance and the time invested to keep them healthy and active is significant, but necessary.

*Thank You*  
**2021 Board of Directors**



## Strategic Plan Alignment

**Relationship Initiative Goal 1:** Broaden Partnerships with Human Service Entities; National Goal #3: People with low-incomes are engaged and active in building opportunities in communities.

### Strategic Priorities #3: Strengthen Community Partnerships

**Objective 1.1:** Provide job placement services for adults.

**Benchmark:** Work with community partners to provide mentorship, apprenticeship, or on the job training.

**Benchmark:** Expand job training and educational opportunities

**Objective 1.2:** Supplement food supply for low income families.

**Benchmark:** Develop partnerships with local food bank agencies in each service area.

<b>Performance Indicator 1: Clients receive certification in high demand occupations.</b>		
<b>Job Training/Certification Program</b>	<b># of Registered Programs in Service Area</b>	<b># of enrollments/ certifications received</b>
Apprenticeship Training Program	8	0
On the Job Training	7	0

<b>Performance Indicator 2: Clients become employed by obtaining full-time positions.</b>		
<b>Job Placement</b>	<b># of Client Assessments</b>	<b># of Job Placements</b>
Full time Employment	19	19 or 100%

<b>Performance Indicator 3: Children and Families nutrition is improved. (Family)</b>		
<b>Delivery of Meals</b>	<b># of Clients</b>	<b># of meals Delivered</b>
Local Food Banks	0	0
Meal Delivery	0	94 (Food Cards)

## Strategic Plan Alignment

***Expansion Initiative Goal 2: Increase Service and Funding Capacity***

***National Goal #1: Individuals and families with low incomes are stable and achieve economic security.***

***National Goal #2: Communities where people with low incomes live are healthy and offer economic opportunity.***

***Strategic Priorities: Develop Opportunities for Unrestricted Funds***

**Objective 2.1:** Create additional service opportunities.

**Objective 2.1.1:** Appoint a committee to explore the feasibility of a charter school.

**Benchmark:** Explore the feasibility of a charter school.

**Benchmark:** Identify health care assistance and transportation.

**Benchmark:** Become a contractor with local agencies to provide insurance enrollments to families.

**Objective 2.2:** Create additional funding opportunities.

**Objective 2.2.1:** Explore the feasibility of a low-income designated credit union.

**Objective 2.2.2:** Explore the feasibility of a foundation.

**Objective 2.2.3:** Explore the feasibility of a thrift store.

<b><i>Performance Indicator 2: Clients obtain transportation for medication and doctor's appointments. (Community)</i></b>		
<b>Community Support</b>	<b># of Eligible Customers</b>	<b># of transportation provided</b>
Partnering Organization	200	Gas Cards: 143 or 71.5%



## Strategic Plan Alignment

### Relationship Initiative **Goal 3: Enhance Brand Identity and Marketing**

**National Goals #3:** People with low incomes are engaged and active in building opportunities in communities.

### **Strategic Priorities #4: Increase Brand Awareness**

**Objective 3.1:** Strengthen communications to promote the organization’s brand.

**Benchmark:** Enhance communications and marketing plan to strengthen presence within communities served.

**Benchmark:** Publish additional videos that showcase programs and services to strengthen presence in communities served.

**Benchmark:** Strengthen social media presence (Facebook, Instagram, and Twitter) to increase number of followings.

**Benchmark:** Ensure branding and marketing collateral is assessable to employees and regional advisory councils.

**Objective 3.2:** Strengthen community outreach and education regarding range of services.

**Benchmark:** Communicate regularly to staff about programs and services offered and any adjustments to those programs and services.

**Benchmark:** Ensure marketing collateral utilized by regional advisory councils promotes The ALPI’s brand.

**Benchmark:** Host an annual open house for the communities served to learn about The ALPI’s programs and services.

<b>Performance Indicator 1: Increase community and awareness of services the organization provides. (Agency)</b>		
Planned Event	Proposed Attendance	# in Attendance
Annual Corporate Meeting and Business Luncheon	400	220 or 55%
LIHEAP Energy Fairs	10 Fairs; 1700 Proposed	10 Fairs: 1288 or 76%
Community Events	500 Juneteenth; Unity in the Community	500+

<b>Performance Indicator 2: Staff can adequately communicate program and appropriate services to assist families.</b>		
Professional Plan Development	# of eligible ALPI Employees	% of Participation
Annual Staff Training	220	100%

<b>Performance Indicator 3: Low-income families are aware of The ALPI’s services and can communicate to others.</b>		
Planned Event	Proposed Attendance	# in Attendance
Annual Corporate Meeting and Business Luncheon	400	220 or 55%
LIHEAP Energy Fairs	1700	1288 or 76%
Community Events	1700	1288 or 76%

## Strategic Plan Alignment

**Highly Skilled Workforce Initiative Goal 4:** Promote STEM education for children and adults.

**National Goals #3:** People with low incomes are engaged and active in building opportunities in communities.

**Strategic Priorities #2:** Improve Child and Adult Services Programs

**Objective 4.1:** Promote STEM education for children and adults.

**Benchmark:** Train staff to achieve proper skills to become STEM certified

**Benchmark :** Establish STEM workshops to encourage long-term mindset for STEM careers.

**Objective 4.2:** Enhance childcare and adult services identified in community assessment survey.

**Benchmark:** Extend service hours to accommodate working families.

**Benchmark:** Provide workshops to equip families with financial and budgeting tools for home ownership opportunities.

<b>Performance Indicator 2: Children and adults improve their problem solving, critical thinking, and discovery skills leading to STEM educational opportunities and careers (Community)</b>		
Client Services	# of enrolled participants	# of Enrolled participation completion
STEM Enrollment	504	504 or 100%
Head Start/Early Head Start	504	504 or 100%
CAT Program/VPK/School Readiness	30	30 or 100%
Family Self Sufficiency	19	14 or 74%

<b>Performance Indicator 3: Increase number of children receiving after hours and weekend childcare services.</b>		
Client Services	# of eligible children	# of children enrolled
Head Start/Early Head Start	15	15 or 1.5%
CAT Program/VPK/School Readiness	399	399 or 100%

## Strategic Plan Alignment

### Expansion Initiative Goal 5: Scale Operations for Future Growth

**National Goals #3:** People with low incomes are engaged and active in building opportunities in communities.

### **Strategic Priorities #4: Increase Brand Awareness**

**Objective 5.1** - Invest in training staff on technology usage

**Benchmark:** Develop training plan for new hires on security policies, computer setup, and navigating within various software and platforms being utilized.

**Benchmark:** Facilitate semi-annually trainings for staff on proper email, computer and internet usage.

**Objective 5.2:** Create action plans for staff's professional development.

**Benchmark:** Identify staff's professional development needs.

**Benchmark:** Create training programs or identify training courses to address staff's professional development needs.

**Benchmark:** Evaluate and assess through annual reviews.

**Objective 5.3:** Streamline processes and procedures.

**Benchmark:** Train staff on shared drive usage and revamp security access of file folders.

**Benchmark:** Create an intranet site to connect staff to work-relevant information including other staff members, company culture, values, policies and procedures, and department information.

<b>Performance Indicator 1: Staff knowledge on the usage of technology is improved and effectiveness increased. (Agency)</b>		
Professional Plan Development	# of Eligible ALPI Employees	# of employees in attendance
Annual Corporate Meeting Training	210	166 or 79%
Zoom Training sessions	130	130
Webinars	130	130

<b>Performance Indicator 2: Increase staff resources and trainings to perform their job. (Agency)</b>		
Professional Plan Development	# of Eligible ALPI Employees	# of employees in attendance
Annual Corporate Meeting Training	210	166 or 79%
Zoom Training Sessions	180	180 or 100%
Webinars	180	180 or 100%

# Accomplishments & Opportunities

## Strategic Plan Alignment

**Expansion Initiative: Goal 5: Scale Operations for Future Growth**

**National Goals #3:** People with low incomes are engaged and active in building opportunities in communities.

**Strategic Priorities #4:** Increase Brand Awareness

<b>Performance Indicator 3: Staff receive certifications that allow professional growth. (Agency)</b>		
Professional Plan Development	# of Eligible ALPI Employees	% of Employee Certification Received
Certified Community Action Professional's	10	3 or 30%
Certified ROMA Trainer and/or Implementer	5	3 or 60%
Family Development Instructor Credential	1	1 or 100%
Family Development Credential	13	11 or 85%
Certified Housing Counselor	3	0
Certified Class Reliable	11	27%

<b>Performance Indicator 4: Reduce paper consumption of staff. (Agency)</b>		
ALPI Locations	# of responsible employees	% Completed
Corporate Office	Human Resources	100%
Administrative Office	Head Start/EHS	68%
Satellite Offices	LIHEAP/ESG/CSBG/EHEAP	20%



# Accomplishments & Opportunities

## FOCUS AREA: Vision and Direction

Vision and Direction – Category 1: Consumer Input and Involvement. Category 3: Community Assessment. Category 4: Organizational Leadership. Category 5: Board Governance.

### Governance Requirements: CSBG Organizational Standards

<i>CSBG Organizational Standard 1.3: The organization has a systematic approach for collecting, analyzing, and reporting customer satisfaction data to the governing board.</i>		
Governance	Compliance	Validation
Board of Directors	Met	Community Needs Assessment 2018 Approved Board of Director’s meeting minutes

### Governance Requirements: Head Start Act: Head Start Program Performance Standards

<i>Head Start Act § 642(c)(1)(E)(iv)(IV) The organization’s governing body has established procedures and guidelines for accessing and collecting information described in the Head Start Act at 642(d)(2).</i>		
Governance	Compliance	Validation
Board of Directors	Met	Head Start Operational Policies and Procedures
Policy Council	Met	Head Start Operational Policies and Procedures

<i>HSPPS § 1301.2(b) The organization’s governing body uses ongoing monitoring results, data on school readiness goals, and other information found in Head Start Performance Standards at § 1302.102 to conduct, and information described in the Head Start Act at 642(d)(2) to conduct its responsibilities.</i>		
Governance	Compliance	Validation
Board of Directors	Met	Bi-monthly Financial Statements Program Information Summary (i.e. enrollment reports, attendance reports, subsidized care, meals and snacks report) Annual External Financial Audit Annual Self-Assessment Communication and Guidance from the Secretary of State Program Information Report

# Accomplishments & Opportunities

## FOCUS AREA: Vision and Direction

### Governance Requirements: Head Start Act: Head Start Program Performance Standards

***HSPPS § 1301.2(b) The organization’s governing body uses ongoing monitoring results, data on school readiness goals, and other information found in Head Start Performance Standards at § 1302.102 to conduct, and information described in the Head Start Act at 642(d)(2) to conduct its responsibilities.***

Governance	Compliance	Validation
Policy Council	Met	Monthly Financial Statements Credit Card Expenditure Reports Program Information Summary (i.e. enrollment reports, attendance reports, subsidized care, meals and snacks report) Annual External Financial Audit Annual Self-Assessment Communication and Guidance from the Secretary of State Program Information Report

***HSPPS § 1302.101(b)(4) The organization’s governing body has approved procedures on data management.***

Governance	Compliance	Validation
Board of Directors	Met	Head Start Operational Policies and Procedures
Policy Council	Met	Head Start Operational Policies and Procedures

***HSPPS § 1302.102(a) The organization’s governing body and policy council have jointly established goals and measurable objectives.***

Governance	Compliance	Validation
Board of Directors	Met	Five-Year Strategic Plan Community Needs Assessment
Policy Council	Met	Five-Year Strategic Plan Community Needs Assessment Revised/Updated 2020

## FOCUS AREA: Vision and Direction

### Governance Requirements: CSBG Organizational Standards

#### Maximum Feasible Participation – Category 3: Community Assessment

<b>CSBG Organizational Standard 3.5: The board formally accepts the completed community assessment. Every Three (3) Years</b>		
Governance	Compliance	Validation
Board of Directors	Met	Community Needs Assessment 2018; Revised/Updated 2020  Approved Board of Director’s meeting minutes

#### Vision and Direction – Category 4: Organizational Leadership

<b>CSBG Organizational Standard 4.4: The board receives an annual update on the success of specific strategies included in the Community Action plan.</b>		
Governance	Compliance	Validation
Board of Directors		Final CSBG FOCAS Report  Board Retreat  Approved Board of Director’s meeting minutes

<b>CSBG Organizational Standard 4.4: The board receives an annual update on the success of specific strategies included in the Community Action plan.</b>		
Governance	Compliance	Validation
Board of Directors		Final CSBG FOCAS Report  Board Retreat  Approved Board of Director’s meeting minutes

<b>CSBG Organizational Standard 4.5: The organization has a written succession plan in place for the CEO/ED, approved by the board, which contains procedures for covering an emergency/unplanned, short-term absence of 3 months or less, as well as outlines the process for filling a permanent vacancy.</b>		
Governance	Compliance	Validation
Board of Directors		Succession Plan 2017  Approved Board of Director’s meeting minutes  Revised Draft 2021

## FOCUS AREA: Vision and Direction

### Governance Requirements: CSBG Organizational Standards

<b>CSBG Organizational Standard 4.6: An organization-wide, comprehensive risk assessment has been completed within the past 2 years and reported to the board.</b>		
Governance	Compliance	Validation
Board of Directors	Met	Risk Assessment 2020 Board Retreat Approved Board of Director's meeting minutes

#### Vision and Direction – Category 5: Board Governance

<b>CSBG Organizational Standard 5.1: The organization's board is structured in compliance with the CSBG Act: 1. At least one third democratically-selected representatives of the low-income community; 2. One-third local elected officials (or their representatives); and 3. The remaining membership from major groups and interests in the community.</b>		
Governance	Compliance	Validation
Board of Directors	Met	Board of Director's By-Laws Board of Directors Roster Seven Low-Income Seven Local Elected Officials or their representatives. Seven Private Sector

<b>CSBG Organizational Standard 5.2: The organization's board has written procedures that document a democratic selection process for low-income board members adequate to assure that they are representative of the low-income community.</b>		
Governance	Compliance	Validation
Board of Directors	Met	Board of Director's By-Laws Regional Advisory Councils Election Procedures Approved Board of Directors Meeting Minutes

# Accomplishments & Opportunities

## FOCUS AREA: Vision and Direction

### Governance Requirements: CSBG Organizational Standards

**CSBG Organizational Standard 5.3: The organization's bylaws have been reviewed by an attorney within the past 5 years.**

Governance	Compliance	Validation
Board of Directors	Met	Annual Shared Governance Training Zoom Roster Board of Director's Meeting Minutes

**CSBG Organizational Standard 5.4: The organization documents that each board member has received a copy of the bylaws within the past 2 years.**

Governance	Compliance	Validation
Board of Directors	Met	Annual Shared Governance Training Zoom Roster

**CSBG Organizational Standard 5.5: The organization's board meets in accordance with the frequency and quorum requirements and fills board vacancies as set out in its bylaws.**

Governance	Compliance	Validation
Board of Directors	Met	Board of Director's By-Laws Approved Board of Directors Meeting Minutes

**CSBG Organizational Standard 5.6: Each board member has signed a conflict of interest policy within the past 2 years.**

Governance	Compliance	Validation
Board of Directors	Met	ALPI Policies and Procedures Manual Required signed copy on File

**CSBG Organizational Standard 5.7: The organization has a process to provide a structured orientation for board members within 6 months of being seated.**

Governance	Compliance	Validation
Board of Directors	Met	Annual Shared Governance Orientation Training Virtually Board Governance Cohort Trainings Zoom Attendance Roster

# Accomplishments & Opportunities

## FOCUS AREA: Vision and Direction

### Governance Requirements: CSBG Organizational Standards

<i>CSBG Organizational Standard 5.8: Board members have been provided with training on their duties and responsibilities within the past 2 years.</i>		
Governance	Compliance	Validation
Board of Directors	Met	Annual Shared Governance Orientation Training Virtual Board Governance Cohort Trainings - 2020 Zoom Attendance Roster

<i>CSBG Organizational Standard 5.9: The organization's board receives programmatic reports at each regular board meeting.</i>		
Governance	Compliance	Validation
Board of Directors	Met	Board of Directors Tasks and Timelines Board of Directors Meeting Agenda ALPI's Board Portal



## FOCUS AREA: Vision and Direction

### Strategic Planning

Establishing the vision for a Community Action Agency is a big task and setting the course to reach it through strategic planning is serious business. CSBG eligible entities take on this task by looking both at internal functioning and at the community’s needs. An efficient organization knows where it is headed, how the board and staff fit into that future and how it will measure its success in achieving what it has set out to do. This agency-wide process is board-led and ongoing. A “living, breathing” strategic plan with measurable outcomes is the goal, rather than a plan that gets written, but sits on a shelf and stagnates. Often set with an ambitious vision, strategic plans set the tone for the staff and board and are a key leadership and management tool for the organization.

### Governance Requirements: CSBG Organizational Standards

#### Maximum Feasible Participation – Category 6: Strategic Planning

<i>CSBG Organizational Standard 6.1: The organization has an agency-wide strategic plan in place that has been approved by the board within the past 5 years.</i>		
Governance	Compliance	Validation
Board of Directors	Met	Five Year Strategic Plan – 2020-2024 Approved Board of Directors Meeting June 25, 2020 Minutes

<i>CSBG Organizational Standard 6.5: The board has received an update(s) on progress meeting the goals of the strategic plan within the past 12 months.</i>		
Governance	Compliance	Validation
Board of Directors	Met	Annual Board Retreat Board of Directors Meeting Reports Approved Board of Directors Meeting Minutes

# Accomplishments & Opportunities

## FOCUS AREA: Vision and Direction

### Governance Requirements: Head Start Act: Head Start Program Performance Standards

<i>HSPPS § 1302.102(b)(2) The organization’s governing body must communicate and collaborate with programs and policy council when conducting the annual self-assessment of progress meeting program goals.</i>		
Governance	Compliance	Validation
Board of Directors	Met	Annual Self-Assessment Programmatic Requirement Training and deadlines Attendance Roster Zoom
Policy Council	Met	Annual Self-Assessment Programmatic Requirement Training and deadlines Attendance Roster Zoom

### Governance Requirements: CSBG Organizational Standards

#### Maximum Feasible Participation – Category 7: Human Resources Management

<i>CSBG Organizational Standard 7.1: The organization has written personnel policies that have been reviewed by an attorney and approved by the board within the past 5 years.</i>		
Governance	Compliance	Validation
Board of Directors	Met	ALPI’s Policies and Procedures – Last revision June 2020 Approved Board of Directors Meeting Minutes

<i>CSBG Organizational Standard 7.4: The board conducts a performance appraisal of the CEO/executive director within each calendar year.</i>		
Governance	Compliance	Validation
Board of Directors	Met	A. Dobison 2021 Approved Board of Director’s Meeting Minutes

# Accomplishments & Opportunities

## FOCUS AREA: Vision and Direction

<b>CSBG Organizational Standard 7.5: The board reviews and approves CEO/executive director compensation within every calendar year.</b>		
Governance	Compliance	Validation
Board of Directors	Met	Annual Performance Evaluation Approved Board of Director's Meeting Minutes

<b>CSBG Organizational Standard 7.7: The organization has a whistleblower policy that has been approved by the board.</b>		
Governance	Compliance	Validation
Board of Directors	Met	ALPI's Policies and Procedures Manual , Effective 2010 Approved Board of Director's Meeting Minutes

## Governance Requirements: Head Start Act: Head Start Program Performance Standards

### Maximum Feasible Participation – Category 1: Consumer Input and Involvement

<b>Head Start Act § 642(c)(1)(E)(iv)(VIII) and HSPPS § 1302.102(b) The organization's governing body reviews results from a Head Start monitoring, including follow-up activities. It also works with program staff and the policy council to address issues during the ongoing oversight and correction process and during a monitoring.</b>		
Governance	Compliance	Validation
Board of Directors	Met	Board of Director's Task's and Timelines February 2020 Board of Director's Meeting Program Reports and Monitoring Results Approved Board of Directors Meeting Minutes

<b>Head Start Act § 642(c)(1)(E)(iv)(VIII) and HSPPS § 1302.102(b) The organization's governing body reviews results from a Head Start monitoring, including follow-up activities. It also works with program staff and the policy council to address issues during the ongoing oversight and correction process and during a monitoring.</b>		
Governance	Compliance	Validation
Policy Council		Policy Council Task's and Timelines February 2020 Policy Council Meeting Program Reports and Monitoring Results Approved Policy Council Meeting Minutes

# Accomplishments & Opportunities

## FOCUS AREA: Vision and Direction

### Governance Requirements: Head Start Act: Head Start Program Performance Standards

#### Maximum Feasible Participation – Category 1: Consumer Input and Involvement

<i>Head Start Act § 642(c)(1)(E)(iv)(VII) The organization’s governing body has approved the organization’s financial management, accounting, and reporting policies.</i>		
Governance	Compliance	Validation
Board of Directors	Met	ALPI’s Accounting Procedures Manual Approved Board of Director’s Meeting Minutes

<i>Head Start Act § 642(c)(1)(E)(iv) The organization keeps track of progress in carrying out the programmatic and fiscal provisions in the grantee’s grant application, which is approved by the governing body.</i>		
Governance	Compliance	Validation
Board of Directors	Met	Board of Director’s Meeting Program Reports Board of Director’s Meeting Budget vs Actual Financial Report Approved Board of Director’s Meeting Minutes
Policy Council	Met	Policy Council Meeting Program Reports Policy Council Meeting Budget vs Actual Financial Report Approved Policy Council Meeting Minutes

<i>Head Start Act § 642(c)(1)(E)(iv)(II) The organization has procedures and criteria for recruitment, selection, and enrollment of children which have been established by the governing board.</i>		
Governance	Compliance	Validation
Board of Directors	Met	Annual Shared Governance Orientation Training Annual Board Retreat Approved Board of Director’s Meeting Minutes
Policy Council	Met	Annual Shared Governance Orientation Training Annual Board Retreat Policy Council Annual Training Approved Board of Director’s Meeting Minutes

# Accomplishments & Opportunities

## FOCUS AREA: Vision and Direction

### Governance Requirements: Head Start Act: Head Start Program Performance Standards

<i>Head Start Act § 642(c)(1)(e)(iv)(V) The organization’s governing body reviews and approves all major policies of the organization.</i>		
Governance	Compliance	Validation
Board of Directors	Met	Annual Shared Governance Orientation Training Annual Board Retreat Approved Board of Director’s Meeting Minutes
Policy Council	Met	Annual Shared Governance Orientation Training Annual Board Retreat Policy Council Board of Director’s Meeting Minutes

<i>Head Start Act § 642(c)(1)(E)(iv)(V), (IX) and HSPPS § 1302.90(a) The organization has written personnel policies and procedures that are available to all staff, and approved by the governing body. They include policies and procedures regarding the hiring, evaluation, compensation, and termination of all Head Start staff and those CAA employees primarily paid with Head Start funds (i.e., a majority of the salary) such as the Executive Director, Director of Human Resources, Chief Fiscal Officer and any other person in an equivalent position.</i>		
Governance	Compliance	Validation
Board of Directors	Met	Employee Acknowledgment Receipt ALPI Policies and Procedures Manual Approved Board of Director’s Meeting Minutes

<i>Head Start Act § 642(c)(1)(E)(iv)(V), (IX) and HSPPS § 1302.90(a) The organization has written personnel policies and procedures that are available to all staff, and approved by the governing body. They include policies and procedures regarding the hiring, evaluation, compensation, and termination of all Head Start staff and those CAA employees primarily paid with Head Start funds (i.e., a majority of the salary) such as the Executive Director, Director of Human Resources, Chief Fiscal Officer and any other person in an equivalent position.</i>		
Governance	Compliance	Validation
Policy Council	Met	ALPI Policies and Procedures Manual Head Start Program Operations Polices Approved Policy Council Meeting Minutes

## FOCUS AREA: Vision and Direction

### Governance Requirements: Head Start Act: Head Start Program Performance Standards

#### Operations and Accountability – Category 8: Financial Operations and Oversight

<b>CSBG Organizational Standard 8.2: All findings from the prior year's annual audit have been assessed by the organization and addressed where the board has deemed it appropriate.</b>		
Governance	Compliance	Validation
Board of Directors	Met	Prior Year's annual audit resulted in no findings

<b>CSBG Organization Standard 8.3: The organization's auditor presents the audit to the governing board.</b>		
Governance	Compliance	Validation
Board of Directors	Met	Virtual Board Retreat Approved Board of Director's Meeting Minutes

<b>CSBG Organization Standard 8.4: and Head Start Act § 642(c)(1)(E)(iv) The governing body/board formally receives, reviews, and approves the financial audit.</b>		
Governance	Compliance	Validation
Board of Directors	Met	Virtual Board Retreat Board of Director's Meeting Approved Board of Director's Meeting Minutes

<b>CSBG Organization Standard 8.7: The board receives financial reports at each regular meeting that include the following: 1. Organization-wide report on revenue and expenditures that compares budget to actual, categorized by program; and 2. Balance sheet/statement of financial position.</b>		
Governance	Compliance	Validation
Board of Directors	Met	Board of Director's Meeting Agenda Board of Director's Meeting Financial Reports; Organization Wide, revenue and expenditures, budget to actual, balance sheet/statement Approved Board of Director's Meeting Minutes (Information)

## FOCUS AREA: Vision and Direction

### Governance Requirements: CSBG Organizational Standards

#### Operations and Accountability – Category 8: Financial Operations and Oversight

<i>CSBG Organization Standard 8.9 and Head Start Act § 642(c)(1)(E)(iv)(VII)(bb): The governing body annually approves an organization-wide budget, including a Head Start operating budget, including all major financial expenditures of the CAA.</i>		
Governance	Compliance	Validation
Board of Directors	Met	Annual Board Retreat Board of Director's Finance Report Approved Board of Director's Meeting Minutes

<i>CSBG Organization Standard 8.10: The fiscal policies have been reviewed by staff within the past 2 years, updated as necessary, with changes approved by the board.</i>		
Governance	Compliance	Validation
Board of Directors	Met	Last Review November 2020, no update required.

<i>CSBG Organization Standard 8.11: A written procurement policy is in place and has been reviewed by the board within the past 5 years.</i>		
Governance	Compliance	Validation
Board of Directors	Met	Annual Shared Governance Orientation Virtual Attendance



## FOCUS AREA: Vision and Direction

### Governance Requirements: CSBG Organizational Standards

Operations and Accountability – Category 9: Data and Analysis

<i>CSBG Organization Standard 9.3: The organization has presented to the board for review or action, at least within the past 12 months, an analysis of the agency's outcomes and any operational or strategic program adjustments and improvements identified as necessary.</i>		
Governance	Compliance	Validation
Board of Directors	Met	Annual Corporate Meeting and Luncheon Annual Board Retreat Approved Board of Director's Meeting Minutes

### Governance Requirements: Head Start Act: Head Start Program Performance Standards

<i>Head Start Act § 642(c)(1)(E)(iv)(VII)(aa) The governing body annually approves all major financial expenditures of the Head Start program.</i>		
Governance	Compliance	Validation
Board of Directors	Met	Annual Corporate Meeting and Luncheon (Virtual) Annual Board Retreat (Virtual) Approved Board of Director's Meeting Minutes

<i>CSBG Organization Standard 8.11: A written procurement policy is in place and has been reviewed by the board within the past 5 years.</i>		
Governance	Compliance	Validation
Board of Directors	Met	Virtual Shared Governance Orientation Attendance Roster Zoom

## FOCUS AREA: Vision and Direction

### Head Start Policy Council

ALPI Head Start and Early Head Start successfully organized and maintained the 2020-2021 Policy Council and Parent Committees at each of the directly operating centers including the representation of parents from the child care providers.

During the 2020-2021 program year; the Parent Committees and Policy Council were established during the month of October 2020 at all the directly operated and contracted centers. The Parent Committees consisted of parents of children enrolled in the Head Start and Early Head Start Program. The Policy Council membership consisted of thirteen (13) parents whose children were enrolled in the program, and five (5) were Community Representatives.

- Annual Board of Director's Retreat in November 2020
- Annual Corporate Board of Director's Meeting in January 2021
- Annual Board of Director's Orientation in February 2021
- Annual Self-Assessment and Evaluation

During the 2020-2021 program year, the Policy Council conducted several tasks and monthly meetings. The Policy Council, in their decision-making role, were able to approve the following:

- Impasse Policies and Procedures
- Program Annual Self-Assessment Report
- Funding Grant Applications
- Human Resources Actions
- Financial Reports
- Program Progress Reports
- School Readiness/Child Outcomes Reports

The Policy Council conducted a total of nine (9) business scheduled meetings, participated in a three-day Program Governance orientation/training, and joint decision-making meetings with the Board of Directors to include, but not limited to Board Retreat, Corporate Annual Closeout Meeting, Board Orientation, Self-Assessment. These meetings are effective for program oversight and accountability.



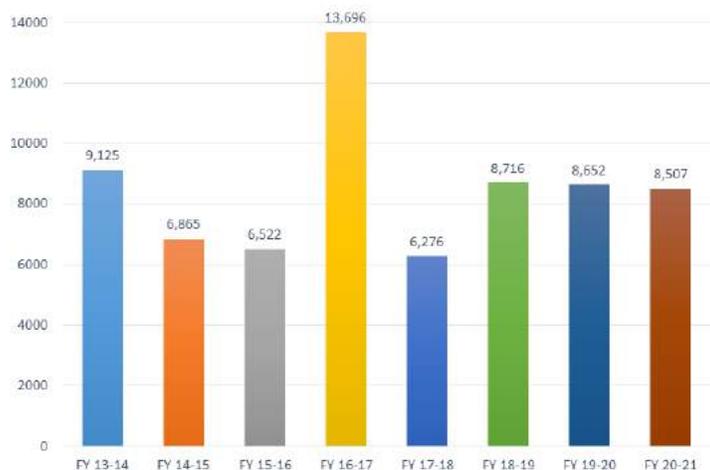
## FOCUS AREA: Operations and Accountability

### Human Resources Management

The human element of ALPI's work is evident at all levels of the organization and the relationship an organization has with its staff often reflects the organization's values and mission. Oversight of the chief executive officer/executive director and maintaining a strong human resources infrastructure are key responsibilities of board oversight. Attention to organizational elements, such as policies and procedures, performance appraisals and training, lead to strong organizations with the capacity to deliver high quality services in low-income communities.

**PERFORMANCE:** As shown below, between FY 13-14 through FY 21-22, employees received a total of 68,052 hours of professional development training, for an average of 8,507 staff training hours per year. Based on an average staff size of 209 employees, this equates to 41 hours of training per employee, per year.

### Overall Staff Training Hours



## FOCUS AREA: Operations and Accountability

### Financial Operations and Oversight

The fiscal bottom line of ALPI is not isolated from its mission, it is a joint consideration. ALPI board and staff maintain a high level of fiscal accountability through audits, monitoring by State and Federal agencies and compliance with Federal Office of Management Budget circulars. The management of federal funds is taken seriously by the ALPI organization and reflect the board's oversight role as well as the day-to-day operational functions.

**The Agricultural and Labor Program, Incorporated**  
**Schedule of Findings and Questioned Costs**  
**Year Ended June 30, 2021**

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**Section I. Summary of Auditor's Results**

**Financial Statements**

Type of report the auditor issued on whether the financial statements audited were prepared in accordance with U.S. GAAP: Unmodified

Internal control over financial reporting:			
Material weakness(es) identified?	<u>Yes</u>	<u>X</u>	No
Significant deficiency(ies) identified?	<u>Yes</u>	<u>X</u>	None Reported
Noncompliance material to financial statements noted?	<u>Yes</u>	<u>X</u>	No

**Federal Awards**

Internal control over major programs:			
Material weakness(es) identified?	<u>Yes</u>	<u>X</u>	No
Significant deficiency(ies) identified?	<u>Yes</u>	<u>X</u>	None Reported

Type of auditor's report issued on compliance for the major programs: Unmodified

Any audit findings disclosed that are required to be reported in accordance with Section 2 CFR 200.516(a)? Yes X No

Identification of major programs:

<u>Assistance Listing Number(s)</u>	<u>Name of Federal Program or Cluster</u>
93.568	Low Income Home Energy Assistance
21.019	Coronavirus Relief Fund

Dollar threshold used to distinguish between Type A and type B programs: \$750,000

Auditee qualified as low-risk auditee? X Yes        No

**Section II. Financial Statement Findings**

No matters to report.

**Section III. Findings and Questioned Costs for Federal Awards**

No matters to report.

**Section IV. Other Reporting**

- No Corrective Action Plan is presented because there were no findings required to be reported under the Federal Single Audit Act.
- No Summary Schedule of Prior Audit Findings is presented because there were no prior audit findings.

### The Agricultural and Labor Program, Inc.

#### SUMMARY OF FINANCIAL AND COMPLIANCE REPORT FOR YEAR ENDED - JUNE 30, 2021

#### FINANCIAL STATEMENTS

- No weaknesses identified.
- No significant deficiencies identified.
- No noncompliance material to Financial Statement noted.

#### FEDERAL AWARDS

- No weaknesses identified.
- No significant deficiencies identified.
- No audit findings disclosed that are required to be reported in accordance with Section 2 CFR 200.516 (a).
- **Qualified as low-risk auditee.**

#### FINANCIAL STATEMENT FINDINGS

- No matters to report.

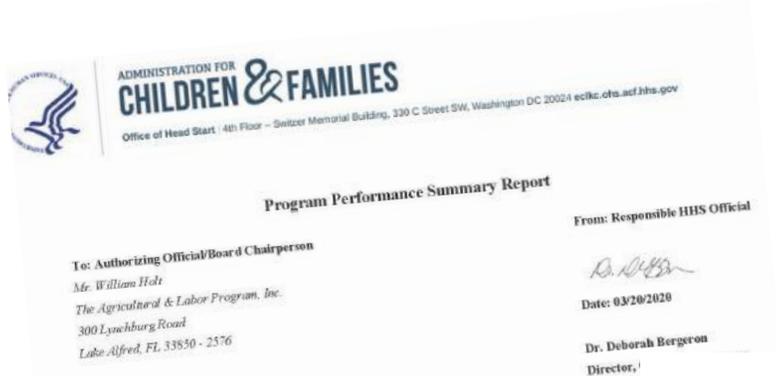
#### FINDING & QUESTIONED COSTS FOR FEDERAL AWARDS

- No matters to report.

## FOCUS AREA: Operations and Accountability

Head Start monitoring protocols are used by the Office of Head Start (OHS) to gather data and other information to assess grantee program operation and performance. Reviews are held for the Classroom Assessment Scoring System (CLASS®), Focus Area One, and Focus Area Two. OHS uses the information collected during reviews to understand the grantee's approach to program design and services. The information is also used to evaluate their performance and continuous program improvement.

## In Compliance



From December 9, 2019 to December 13, 2019, the Administration for Children and Families (ACF) conducted (FAI) monitoring review of the The Agricultural & Labor Program, Inc. Head Start and Early Head Start program. This report contains information about the grantee's performance and compliance with the requirements of the Head Start Standards (HSPPS) or Public Law 110-134, Improving Head Start for School Readiness Act of 2007.

The Office of Head Start (OHS) would like to thank your governing body, policy council, parents, and staff for their participation in the review process. The FAI review allows the OHS to understand how programs are progressing in their grant cycle. The report includes the performance measures used to understand grantee progress towards program goals. This report to identify where your program was able to describe progress toward implementing program as well as outcomes for children and families. Please contact your Regional Office for guidance should you have any questions. Your Regional Office will follow up on the content of this report and can work with you to identify reasons for program's continuous improvement.

### DISTRIBUTION OF THE REPORT

Dr. Calvin Moore, Regional Program Manager  
 Ms. Arlene Dobson, Chief Executive Officer/Executive Director  
 Mrs. Caroline W Looney, Head Start Director  
 Mrs. Caroline W Looney, Early Head Start Director

### Glossary of Terms

<b>Opportunity for Continuous Improvement (OCI)</b>	An OCI is identified when the grantee is determined compliant in an area, however, through intentional, continuous improvement strategies, the agency has the opportunity to enhance overall program quality.
<b>Area of Concern (AOC)</b>	An area for which the agency needs to improve performance. These issues should be discussed with the grantee's Regional Office of Head Start for possible technical assistance.
<b>Area of Noncompliance (ANC)</b>	An area for which the agency is out of compliance with Federal requirements (including but not limited to the Head Start Act or one or more of the regulations) in one or more areas of performance. This status requires a written timeline of correction and possible technical assistance or guidance from the grantee's program specialist. If not corrected within the specified timeline, this status becomes a deficiency.
<b>Deficiency</b>	As defined in the Head Start Act, the term "deficiency" means: (A) a systemic or substantial material failure of an agency in an area of performance that the Secretary determines involves: (i) a threat to the health, safety, or civil rights of children or staff; (ii) a denial to parents of the exercise of their full roles and responsibilities related to program operations; (iii) a failure to comply with standards related to early childhood development and health services, family and community partnerships, or program design and management; (iv) the misuse of funds received under this subchapter; (v) loss of legal status (as determined by the Secretary) or financial viability, loss of permits, debarment from receiving Federal grants or contracts, or the improper use of Federal funds; or (vi) failure to meet any other Federal or State requirement that the agency has shown an unwillingness or inability to correct, after notice from the Secretary, within the period specified; (B) systemic or material failure of the governing body of an agency to fully exercise its legal and fiduciary responsibilities; or (C) an unresolved area of noncompliance.

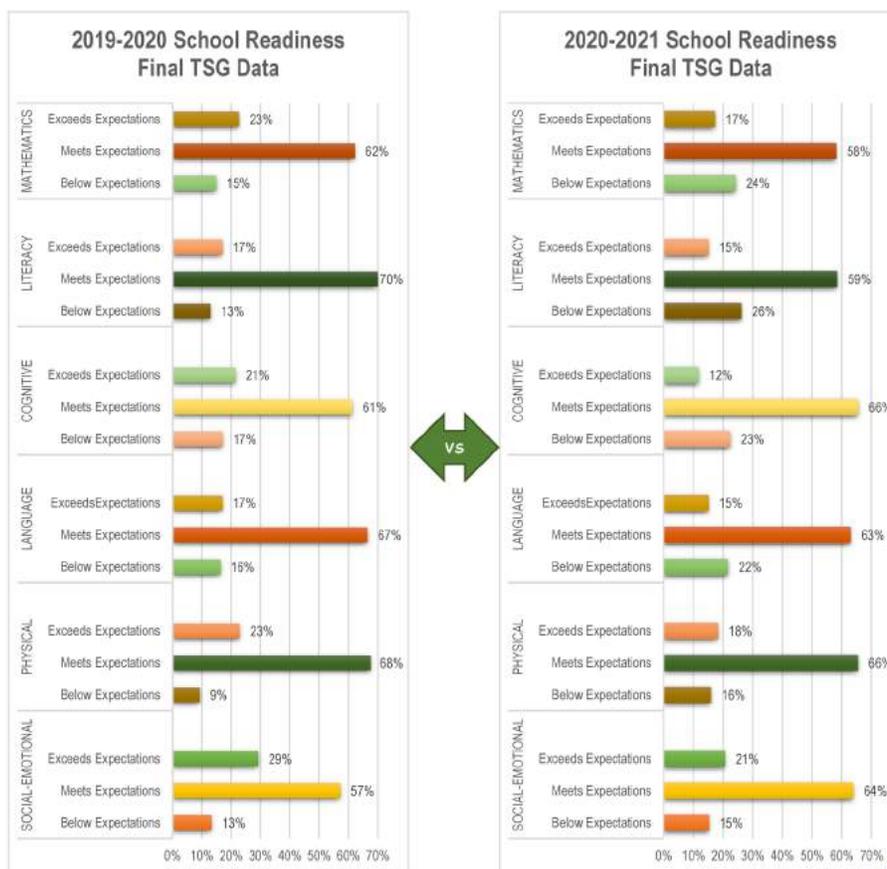
## FOCUS AREA: Operations and Accountability

### Data and Analysis

The ALPI's Head Start and Early Head Start Program provides high-quality early education and child development services, including children with disabilities, that promote children's cognitive, social and emotional growth for later success in school. This report represents a summary of the 2020-2021 Program's approach to service delivery and accomplished goals and objectives as mandated by federal and state regulations and requirements. The report includes data obtained from the unofficial Program Information Reports, Program Database Systems, and other formal and informal reports.

The Agricultural and Labor Program, Inc., Head Start and Early Head Start Programs as its online child assessment system, utilize the Teaching Strategies GOLD. Teaching Strategies is an ongoing observational system for assessing children from birth through kindergarten.

The aggregated data below represents the Teaching Strategies GOLD (TSG) Spring School Readiness results comparison between the last two challenging years. The data demonstrates that the largest percentage of children are meeting or exceeding expectations in the 2020-2021 school year.



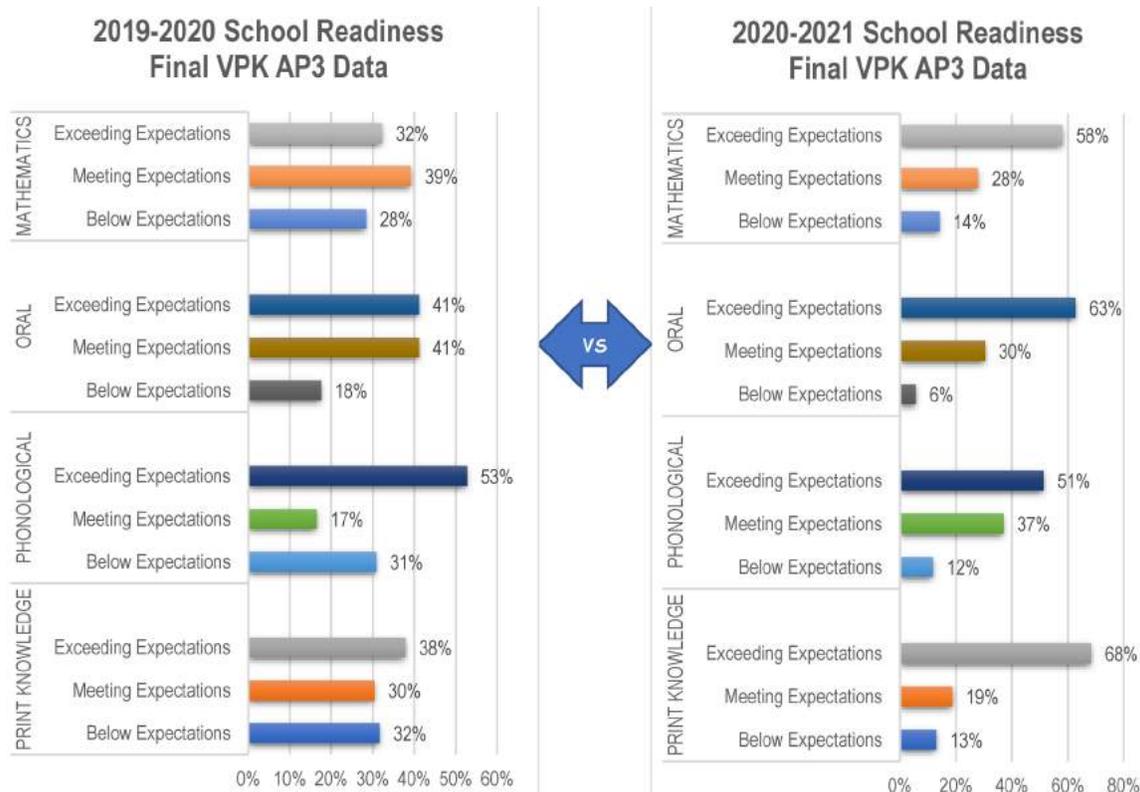
## FOCUS AREA: Operations and Accountability

### Florida Department of Education VPK Assessment Online Reporting System

The Agricultural and Labor Program, Inc., (ALPI) Head Start/Early Head Start Program, aggregates and analyzes child assessments from various tools used during the program operating period to evaluate and measure the program's progress towards meeting the school readiness goals and objectives established in the Head Start and Early Head Start Baseline Funding Grant Application.

ALPI has compared school readiness data from the last two years to track and monitor the impact of COVID-19 Pandemic, and the progress towards moving forward with full and in-person learning. Recognizing similarities, growth, stability, patterns, and trends will assist in developing new strategies to meet 100% of the established goals and objectives. The School Readiness/Child Outcomes are based on a combination of data collected from various tools. The data below represents program progress towards achieving goal 1.

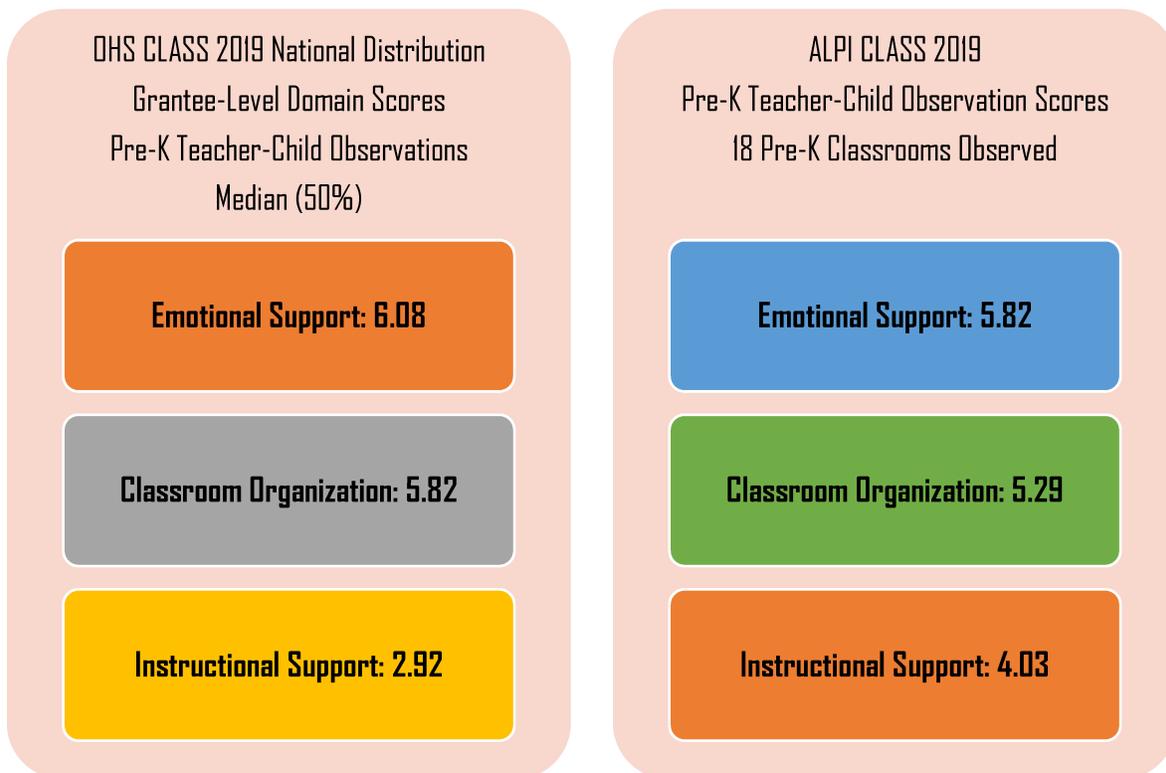
The aggregated data below represents the VPK Assessment Period 3 results comparison between the last two challenging years. The data demonstrates that the largest percentage of children are meeting or exceeding expectations in the 2020-2021 school year.



## FOCUS AREA: Operations and Accountability

### CLASS Scoring System Scores

The Agricultural and Labor Program, Inc., Head Start and Early Head Start Programs, use data from the classroom interactions utilizing the C.L.A.S.S. Scoring System tool, to measure teacher-child interactions, and to allow quality improvement of multiple domains in accordance with the child's age. In the fall of 2019, 18 (50%) of the pre-k classrooms were observed, the scores revealed that we are improving in the area of instructional support; however, in the areas of emotional support, and classroom organization ALPI Pre-K Teacher-Child scores are below the national grantee level median. The graph below represents a comparison of the scores of the 2019 CLASS Scores.



## FOCUS AREA: Operations and Accountability

### Responsiveness in Early Head Start

As part of ALPI's continuous improvement in all aspects of the comprehensive early education, ALPI measures the responsiveness of care in the Early Head Start classrooms; although, as of today, the OHS does not use the CLASS Scoring System tool to measure responsiveness, the State School Readiness Program does; therefore, we used the same tool for our Early Head Start classrooms. The graphs below represent the fall of 2019 scores for Toddlers and Infants CLASS Scores.

#### Toddlers CLASS 2019 Scores

- Emotional and Behavioral Support **5.69**
- Engaged Support for Learning **3.71**

#### Infants CLASS 2019 Scores

- Responsive Caregiving **3.71**

Lincoln Park HSC **5.89**

Queen Townsend HSCII **5.73**

Francina Duval HSC **5.64**

Child Development & FSC **5.53**

George W. Truitt FSC **5.45**

Garden Terrace HSC **5.08**

As part of ALPI's efforts to provide extended day services to low income families, ALPI provides school readiness services for eligible families. Participating families must seek eligibility through the State prior to beginning services. It is expected that school readiness services further assist in preparing children to be ready for school. For those

reasons, the State has implemented CLASS Scoring System tool, across child care providers as part of their eligibility in providing the school readiness services. The graph represents the composite scores of the 50% of Head Start/Early Head Start classrooms observed by the Early Learning Coalition of St. Lucie County in April 2021.

# Accomplishments & Opportunities

## FOCUS AREA: Operations and Accountability

### Head Start/Early Head Start Program



The ALPI Head Start and Early Head Start Program conducted Science Fairs throughout the month of March 2021. Children experienced various experiments to include the one in these pictures of a Volcano and Lava.



The ALPI Head Start and Early Head Start Program conducted two "Food Drives" for Thanksgiving Celebration and Winter Break during the 2020-2021 School Year. Our partnership with the St. Lucie County Public School Food Services Department made this possible.



March 2, 2021  
Celebrating national Read Across American Day. The ALPI Head Start and Early Head Start Centers celebrated Dr. Sues birthday, promoting early literacy.



# Accomplishments & Opportunities

## FOCUS AREA: Operations and Accountability

### Head Start/Early Head Start Program



The ALPI provided a small gift to all children participating at the Head Start/Early Head Start Centers on Thursday, December 17, 2020, in St. Lucie and Polk County. Our Sponsors included: Kaplan Early Learning Company, iTHINK Financial Services, Walmart, IRSC, and Staff.



## Head Start/Early Head Start Technology Project

### ACTIVATION OF DATA PORTS & CABLE DROPS

In order to provide a superior connection experience, for both children and staff, it was determined that all devices would connect via ethernet cable. Vastly superior to wifi, this type of connection will greatly minimize any future issues, support or maintenance. Because all locations were previously cabled for ethernet, this part of the project consisted primarily of activating existing data ports, via their switches. *COMPLETED: Approximately 82 data ports were activated across (7) separate locations and (5) cable drops were completed, for a total of 87 working connections.*



*Newly re-activated data ports.*



*Switch box used to distribute internet connectivity and save cost of additional cabling.*

## Head Start/Early Head Start Technology Project

Hatch “We Play Smart” Interactive Tables have been received in both SLC and Polk counties, for Early Head Start, as follows.

PSL CHILD DEV.        2

GWTRUITT            2

FROSTPROOF        2

JUMPSTART           1

*Contracted Center*

Hatch is currently in the process of scheduling a dedicated installer for these computers and interactive tables, but they predict work will begin the week of 9/21. **COMPLETED: 97 computers and 7 interactive tables have been received.**



*Children enjoying “We Play Smart” Interactive Table.*

## Head Start/Early Head Start Technology Project

### CREATION OF COMPUTER LABS

A total of (4) computer labs have been commissioned, as follows: (2) at Queen Townsend Head Start Center and (2) at ALPI Child Development and Family Center in Port St. Lucie, FL. Each lab will contain (20) all-in-one Hatch computers, all connected via ethernet cable. In order to help minimize costs, small switches were used to provide internet to clusters of computers (4-6-8). Port St. Lucie's computer labs will be completed the week of 9/21. *COMPLETED: The computer lab at QTC has been completed.*



*Computer lab desks consist of (2) students per desk, so (2) ethernet cable connections per desk.*

### HATCH COMPUTERS & INTERACTIVE TABLES

Hatch computers have been received in SLC and they are currently at their respective locations, awaiting installation, as follows.

QTC	40
PSL CHILD DEV.	40
LINCOLN PARK	6
FRANCINA DUVAL	2
GARDEN TERRACE	5
GWTRUITT	3
LEARNING TREE	1
<i>Contracted Center</i>	



*Hatch pc is an all-in-one unit.*

## Head Start/Early Head Start Technology Project

### INTERACTIVE BOARDS

Approximately 27 A&E Interactive Boards have been delivered, placed and configured. One Board was returned to the factory for replacement within the next two weeks. These high-resolution, multi-purpose boards provide daily digital interactive activities for students, the ability to conduct virtual learning classes, and accessibility to Zoom meetings. All boards are equipped with a high-resolution webcam. *COMPLETED: 27 interactive boards have been received and distributed as follows.*

QTC	13
PSL CHILD DEV.	9
LINCOLN PARK	1
FRANCINA DUVAL	1
GARDEN TERRACE	1
GWTRUITT	1
LEARNING TREE <i>Contracted Center</i>	1



*Children are visibly captivated by the new technology.*

## Head Start/Early Head Start Technology Project

### ALPI VIRTUAL LEARNING VIA INTERACTIVE BOARDS



*Both teachers and students have a total blast during virtual learning!*



*Technology makes learning both accessible and fun, even during a time of stress and crisis.*

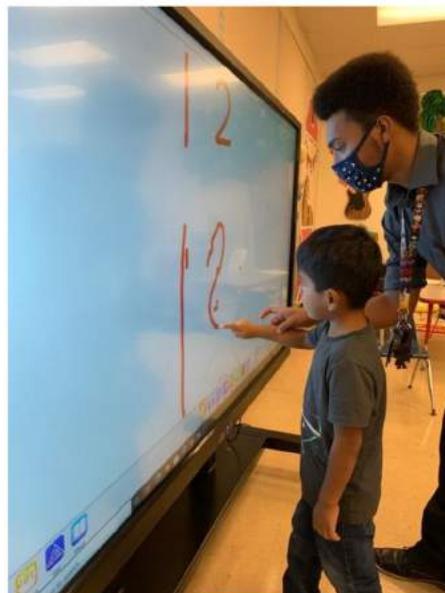


*ALPI staff created a real "studio" for virtual learning sessions. Creativity abounds at ALPI.*

## Head Start/Early Head Start Technology Project

### CLASSROOM INTERACTIVE BOARDS ARE SUPER COOL!

*The students are physically and mentally engaged with the new technology. Students are excited to go to school and start the day knowing they have super cool technology they work on and can brag about to friends and family.*



*It's all about "interaction". Students are active participants in the new technology, not just observant bystanders. They love learning!*

# Accomplishments & Opportunities

## Head Start/Early Head Start Technology Project



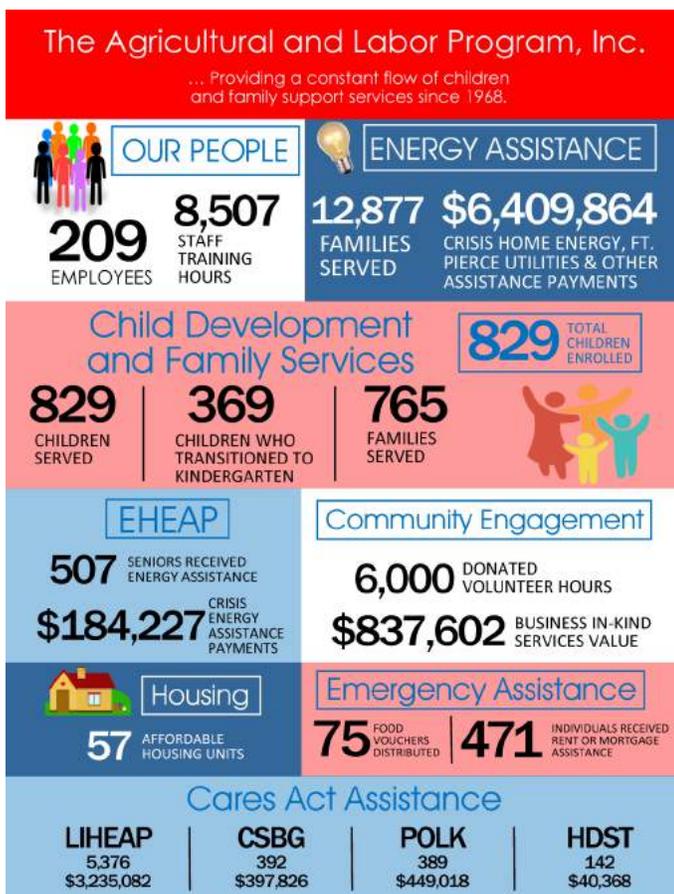
*Computer Lab at ALPI Child Development and Family Services Center, Port St. Lucie, FL*

# Accomplishments & Opportunities

## FOCUS AREA: Operations and Accountability

### Data and Analysis

Annually, ALPI is required to track and report on what happens to families, agencies and communities, as a result of services provided. The outcomes of clients and communities, as a result of agency program services and activities, are reported to the Board of Directors on an annual basis. The data is utilized as a planning tool to ensure the relevance of program services provided to children, families and farmworkers.



## Agency Budget: 2021 - 2022

The Agricultural and Labor Program, Inc.  
Fiscal Year 2021-2022  
Agency Budget

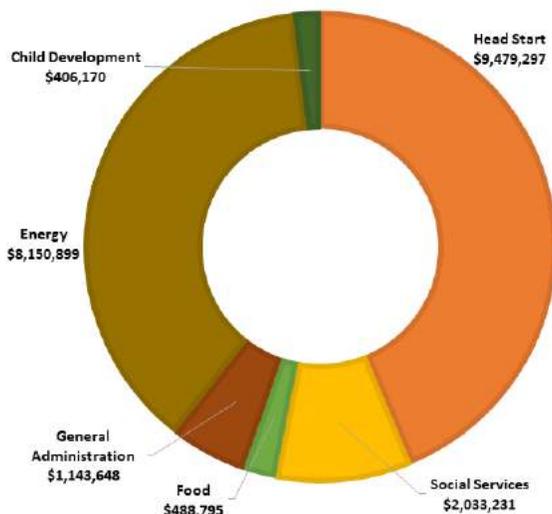
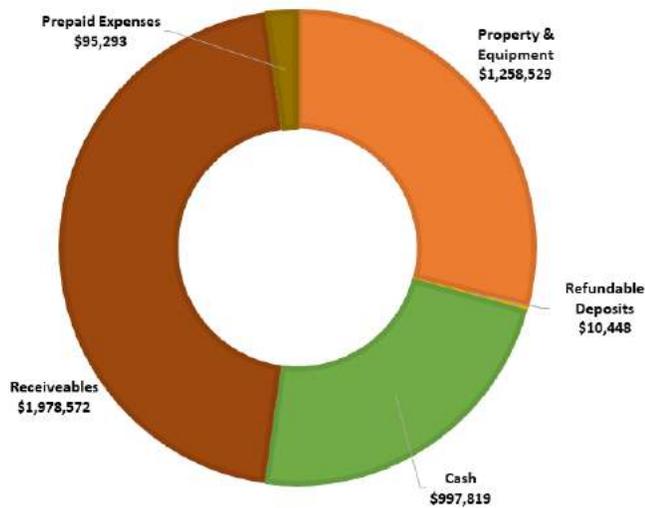
REVENUES	FY 22	FY 21
Head Start / Early Head Start (St. Lucie/Polk Counties)	9,818,560	9,816,095
Head Start COVID 19	506,311	688,497
HS EHS Amercian Rescue Plan	1,418,104	54,148
ALPI Child Care Centers (St. Lucie/Polk Counties)	82,755	82,755
ALPI CC Polk CARES	-	12,900
Polk ELC VPK	-	24,538
St Lucie County Early Learning VPK	703,985	681,912
USDA Food	967,460	967,460
Children's Services Council	110,964	114,870
Department of Economic Opportunity LIHEAP	6,227,080	6,227,080
Department of Economic Opportunity LIHEAP COVID 19	4,074,391	4,074,391
Department of Economic Opportunity LIHEAP ARP	2,860,108	
Senior Connection Center, Inc. EHEAP	159,943	162,490
Department of Economic Opportunity CSBG	1,010,160	977,084
Department of Economic Opportunity CSBG COVID 19	1,368,681	1,368,681
Polk Co Emergency Rental Assistance (ERAP)	3,300,000	
FPUA COVID 19	-	50,000
United Way COVID 19	-	463,449
Emergency Solutions Grant	64,303	53,265
Permanent Supportive Housing (PSH)	36,409	36,409
Department of Education EA	50,000	50,000
Florida Non Profit Housing	31,350	31,350
FACA\ Western Union	32,511	32,511
H.U.D. Housing Couseling	17,908	15,256
ATEC	12,250	10,100
E-rate	27,950	27,950
Fund Raiser	35,000	35,000
Other	1,145	1,145
In-Kind / Cash Match	-	0
<b>TOTAL REVENUE</b>	<b>32,917,328</b>	<b>28,895,544</b>
<b>EXPENSES</b>		
Salaries and Wages	8,835,995	8,709,274
Fringe Benefits	2,370,806	2,334,922
Communications	442,765	386,965
Travel	236,588	215,514
Food	545,800	545,800
Rent and Utilities	1,412,612	1,240,447
Contractual Services	543,494	504,494
Materials and Supplies	2,484,734	3,731,291
Training	230,008	219,155
Grants, Subsidies and Contributions	14,482,649	9,704,420
Subcontractors	1,197,837	1,185,237
In-Kind	-	0
Other	134,040	118,025
<b>TOTAL EXPENSES</b>	<b>32,917,328</b>	<b>28,895,544</b>

## FY 2021 Financial Highlights

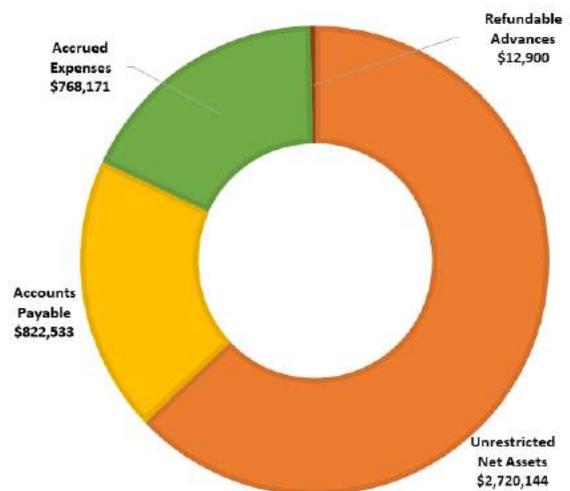
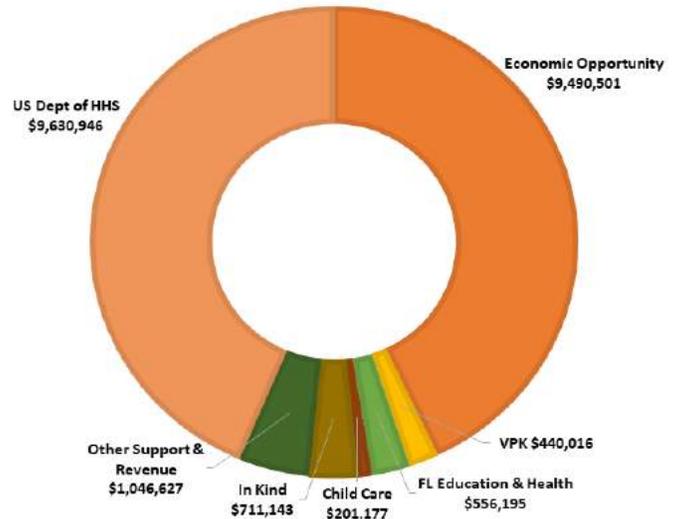
# 95%

OF ALL FUNDING RECEIVED GOES DIRECTLY TO PROGRAM SERVICES

### STATEMENT OF FINANCIAL POSITION



### STATEMENT OF ACTIVITIES



Change In Net Assets:  
\$374,565

# Special Thanks & Recognition

Special thanks and recognition to all councils and housing board members who very generously donate of their time and energy to further the mission of the Agricultural and Labor Program, Inc.

## Regional Advisory Councils

### Central

Glenda Jones	Clora Dubose	Patricia Salary	Doris Parker
Johnnie McNair	Mary Shepherd	Josephine Howard	Marian Owens
Vermell Brown	Dartha Shular	Jennie Calhoun	Earnestine Davis
Linda Bailey	Jacqueline Rentz	Margaree B. Simon	Victoria Frazier
Ruby Willix	Beulah Jones	Annie Larkins	

### Eastern

William Holt	Constance Griffin	Betty Bradwell	Mercadez Estime-Connolly
Marjorie Gaskin	Frances Cooper	Gena Spivey	Sonya Allen-Baylor
Bobby Byrd	Angela Jules	Debra Williams	
Beverly Richardson	Clarence Brown	Tiffany Wilder	

### Northern

Chester McNorton	Donald Tillman	Nereida Jackson	Annette Brown
Shelia Dixon	Constance Anderson	Evelyn Seabrook	Joseph Washington
David Rucker	Charles Harris, Jr.	Maureen Lewis	Charles Daymon

### Southern

Kimberly Ross	Ruth A. Gay	Tracy Maloy	Terry Wellington
Annie Robinson	Annette Jones	Ty'Ree Matthews	N'Kosi Jones
Noemi Cruz	Bernice Lopez	Yvette Wingate	John Ash
Katie Clarke	Emma Malcolm	Barbara Grace	

## Head Start/Early Head Start Policy Council

Peter Negron, Jr.	Brittni Patterson	Brady Roberts	Tonisha Davis
Nicola Brotherton	Brandi Ti'Elzra Walker	Michelle Coleman	Yolanda Robinson
Tony Taloute	Tyresha Marie Reynolds	Donna Gibson	<b>Alternates</b>
Cristella Gonzales	Josephine Howard	Amy Patterson	Katrina Bryant
Barbara Jean Aponte	Kevin Singletary	Joanne Saintelus	Tyeicha Cooper

## ALPI Housing Development Board

Josephine Howard	Nathaniel Birdsong	Johnnie McNair	Elizabeth Scaife
Phillip Howard	Leola Lewis	Jacqueline Rentz	

# Special Thanks & Recognition

Special thanks to the ALPI Board of Directors for your tireless fundraising and personal financial contributions throughout this past year, to ALPI staff for your contribution, continued commitment and dedication to the mission of the Agricultural and Labor Program, Inc., and to the following for your generous contributions and Circle of Support participation.

ALPI Executive Department

Randy Bethel

Randy Bethel/Covenant Cleaning Services

Clarence Brown

Dr. Alicia Claircius

Adam Crappel

Arlene Dobison

Willie and Annie Dobison

Tarah Dobison

Duke Energy

Patricia Gamble

Marjorie Gaskin

Tara Glover

William and Lillie Holt

Debbie Jeffers

Deloris Johnson

Annie B. Larkins

Laws and Associates

Cynthia Morales

NAACP - Haines City, FL

James Pasley

Tonmiel Rodriguez, Esq.

Fred Stickney

Jonathan and Sandra Thiele

Seretha Tinsley - PenGeo

Mrs. George W. Truitt

THANK YOU!



*Congratulations*

**ALPI**

**On Your 2022 Annual  
Corporate Meeting  
and Luncheon**

*from the*

**Dobison and Williams Families**



# Laws & Associates, Inc.



When it comes to managing your finances

## We do business the old fashioned way

### + Our Services

- Assets Management
- Investment Management
- Insurance Services
- Retirement & Estate
- Employee Benefit Plans
- Financial Planning
- Customized Solutions
- And More

Manage your finances wisely by relying on Laws and Associates, Inc.

#### Customized Solutions



Here at Laws and Associates INC, we are committed to helping clients throughout the state of Florida handle their finances prudently. Having been in the industry since 1977, we are the trusted financial planning company when it comes to dependable assistance in assets and investment management. Through the leadership of Lorenzo Laws, LUTCF, we guarantee to deliver customized financial solutions that work best for your specific condition.

#### Full Array of Services



Laws and Associates, INC is a full-service financial planning company providing an array of services for various money management concerns. We provide a complete range of financial planning and insurance services. We also offer personalized solutions for investments, retirement, estate, and employee benefit plans.

#### Qualified Advisors



We are home to qualified financial advisors offering extensive money management solutions such as investment advisory and insurance services. We can assist you in creating a workable plan that will help you achieve your financial goals.



#### We Have You Covered

Whether you need comprehensive investment advisory or you require a feasible financial retirement plan, we have you covered.

Entrust your financial planning to the experts of Laws and Associates, Inc. today. Get in touch with us to inquire about the various financial planning services we offer.

Lorenzo Laws, LUTCF  
P. O. Box 904  
Saint Augustine, FL 32085

Phone: 904-797-8940  
Fax: 904-797-8949  
Email: llaws5@bellsouth.net

Brittney Laws, Director of Sales  
[www.lawsfinancialgroup.com](http://www.lawsfinancialgroup.com)

# Willis DOBISON

*Sunrise* 3.26.1971

*Sunset* 6.10.2021

I tell you with certainty, today you  
will be with me in paradise.

Luke 23:43

SON | HUSBAND | BROTHER | FATHER | GRANDFATHER





# DUKE ENERGY®



**Congratulations to  
The Agricultural and  
Labor Program, Inc.**

**On Your 2022 Annual  
Corporate Meeting  
and Luncheon**

## DUKE ENERGY ASSISTANCE PROGRAMS

Multi Family

Low Income Weatherization Assistance

Neighborhood Energy Saver

Duke Energy: One of Fortune's  
"World's Most Admired Companies"

[www.duke-energy.com](http://www.duke-energy.com)



*Congratulations*  
THE AGRICULTURAL AND  
LABOR PROGRAM, INC.



**I proudly join you in the celebration  
of 54 years of success.**

**Job Well Done ... Keep Moving!**

*Deloris C. Johnson*  
NMCS  
NonProfit Management  
Consultant Services, LLC

# PenGeo, Inc./Tinsley Family Concessions, Inc.

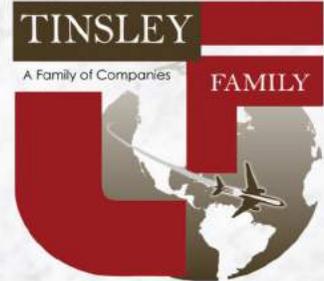
*"A Tradition of Corporate Excellence and Community Service."*

PenGeo, Inc.



**KFC**  
Auburndale, FL

# ALPI



## Congratulations and Best Wishes

*George, Sr., George II, and Seretha*  
*PenGeo, Inc. and Tinsley Family Concessions, Inc.*

(863) 299-7177 [www.tfcfamily.com](http://www.tfcfamily.com)



**The Haines City Branch #5150 - National Association for the Advancement of Colored People**

The NAACP's principal objective is to ensure the political, educational, social and economic equality of all citizens of the United States and eliminate race prejudice. The NAACP seeks to remove all barriers of racial discrimination through the democratic processes.

Cynthia Downing, President | P.O. Box 3595 | Haines City, FL 33845

*Congratulations*  
**AGRICULTURAL AND  
LABOR PROGRAM, INC.**

**ON 54 YEARS OF HELPING  
PEOPLE AND CHANGING LIVES**



THE AGRICULTURAL AND LABOR PROGRAM, INC.

*The Thiele Law Firm*



**JONATHAN  
THIELE, ESQ.**

**202 LAKE MIRIAM DRIVE  
SUITE W-2  
LAKELAND, FL 33813**

**863-937-6861**

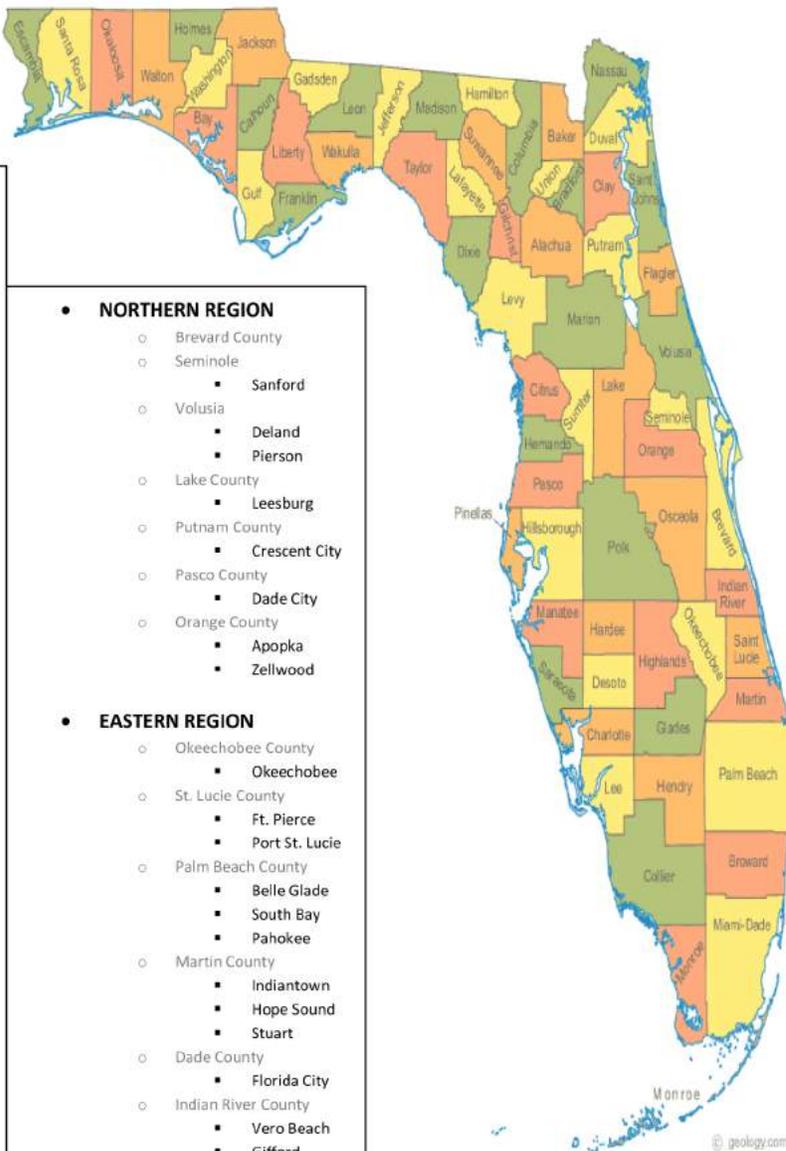
**THIELELAWFIRM@GMAIL.COM**

*We are here for you when you need us.*

# Regional Geographic Target Areas



## REGIONAL GEOGRAPHIC TARGET AREAS



- **CENTRAL REGION**
  - North Osceola County
  - Hillsborough County
    - Dover
    - Ruskin
    - Wimauma
    - Plant City
  - North Polk County
    - Lakeland
    - Bartow
    - Lake Alfred
    - Auburndale
    - Winter Haven
    - Haines City
    - Mulberry
    - Polk City
    - Davenport
    - Bradley
    - Waverly
    - Poinciana
    - Juanita
    - Eagle Lake
    - Gordonville
    - Eloise
    - Gordon Heights
- **SOUTHERN REGION**
  - Highlands County
    - Avon Park
    - Sebring
    - Lake Placid
  - Southern Polk County
    - Lake Wales
    - Ft. Meade
    - Frostproof
  - Southern Osceola County
  - Hendry County
    - Labelle
    - Clewiston
  - Glades County
    - Moore Haven
  - Collier County
    - Immokalee
    - Naples
  - Hardee County
    - Wauchula
    - Bowling Green
    - Zolfo Springs

- **NORTHERN REGION**
  - Brevard County
  - Seminole
    - Sanford
  - Volusia
    - Deland
    - Pierson
  - Lake County
    - Leesburg
  - Putnam County
    - Crescent City
  - Pasco County
    - Dade City
  - Orange County
    - Apopka
    - Zellwood
- **EASTERN REGION**
  - Okeechobee County
    - Okeechobee
  - St. Lucie County
    - Ft. Pierce
    - Port St. Lucie
  - Palm Beach County
    - Belle Glade
    - South Bay
    - Pahokee
  - Martin County
    - Indiantown
    - Hope Sound
    - Stuart
  - Dade County
    - Florida City
  - Indian River County
    - Vero Beach
    - Gifford
    - Fellmere

January 2021

## Locations

### **POLK COUNTY**

Frostproof Child Development Center  
701 Hopson Road  
Frostproof, FL 33843

### **ST. LUCIE COUNTY**

Lincoln Park Head Start Center  
1400 Avenue M  
Fort Pierce, FL 34950

Francina Duval Head Start Center  
1035 South 27th Circle  
Fort Pierce, FL 34950

G. W. Truitt Family Services Center  
1814 North 13th Street  
Fort Pierce, FL 34950

Garden Terrace Head Start Center  
1110 North 32nd Street  
Fort Pierce, FL 34950

Queen Townsend Head Start Center II  
2202 Avenue Q  
Ft. Pierce, FL 34950

ALPI Child Development and  
Family Services Center  
198 NW Marion Avenue  
Port St. Lucie, FL 34983

### **CONTRACTED CENTERS - ST. LUCIE and POLK COUNTIES**

Learning Tree Academy, Inc.  
2808 Avenue D  
Fort Pierce, FL 34947

Jumpstart Development Center  
1068 Pine Avenue  
Lake Wales, FL 33853

### **CONTRACTED CENTERS - MARTIN COUNTY**

Dunbar Early Learning Center  
12100 SE Lantana Avenue  
Hobe Sound, FL 33455

Little Scholars Child Development Center, Inc.  
2721 NW Mall Circle  
Jensen Beach, FL 34957

YMCA Louis Dreyfus Citrus Branch  
16451 SW Farm Road  
Indiantown, FL 34956

Gertrude Walden Child Care Center, Inc.  
601 SE Lake Street  
Stuart, FL 34994

Hobe Sound Early Learning Center  
11580 SE Gomez Avenue  
Hobe Sound, FL 33455

## Service Delivery Sites

The Community Services Block Grant (CSBG) Program is comprised of two components: the Family Self-Sufficiency Program (FSSP) and Emergency Services. Applicants may apply, through appointment only, for services at the following locations.

### **GLADES COUNTY**

Glades County Community Development Dept.  
Goodwill Industries of Southwest Florida

### **HENDRY COUNTY**

Glades County Community Development Dept.  
Goodwill Industries of Southwest Florida

### **HIGHLANDS COUNTY**

Big Brothers/Big Sisters of the Sun Coast, Inc.  
Avon Park Housing Authority

### **POLK COUNTY**

Agricultural and Labor Program, Inc.  
Boys and Girls Club of Lakeland, Inc.  
Center for Independent Living  
New Horizons Apartment Complex  
Women's Resource Center  
Family Fundamentals

## Service Delivery Sites

The Low-Income Home Energy Assistance Program (LIHEAP) provides assistance through payment of electric bills on behalf of eligible households. A client can receive one home energy payment and crisis payment per year. Services are provided in six counties at the following locations.

### COLLIER COUNTY

COFFO  
Macedonia Baptist Church  
Goodwill Industries  
of Southwest Florida

### HENDRY COUNTY GLADES COUNTY

Goodwill Industries  
of Southwest Florida

### HIGHLANDS COUNTY

ALPI - Avon Park Office

### MARTIN COUNTY

Jesus House of Hope  
New Bethel AME  
Port Salerno Church of God

### POLK COUNTY

ALPI - Lake Alfred Corporate  
Florence Villa CDC

### ST. LUCIE COUNTY

In the Image of Christ, Inc.  
Mustard Seed Ministries



## Service Delivery Sites

### **COLLIER COUNTY**

Collier County  
Housing Authority  
FCDP Immokalee  
Technical College

### **MIAMI-DADE COUNTY**

FCDP South Dade Skills Center

### **HILLSBOROUGH COUNTY**

FCDP The Family Learning Center  
RCMA Balm

### **MANATEE COUNTY**

FCDP Manatee Adult, Career  
and Technical Education

### **ORANGE COUNTY**

Orange County School  
District Westside Technical Center

### **PALM BEACH COUNTY**

Farmworker Career Development

### **POLK COUNTY**

Frostproof Care Center  
FCDP East Area Adult School  
Farmworker Ministry, Inc.  
RCMA Mulberry

### **PUTNAM COUNTY**

FCDP

### **ST. LUCIE COUNTY**

FCDP Indian River State College

### **VOLUSIA COUNTY**

ALPI Technical Education Center (ATEC)



# Contact Information

## LAKE ALFRED, FL

### EXECUTIVE DEPARTMENT

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Winter Haven, Florida 33885

863-956-3491  
Arlene Dobison, CCAP, CEO

863-956-3491, x204  
Maria Crespo, Executive Office Manager

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863-956-3491, x210  
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### COMMUNITY SERVICES & ECONOMIC DEVELOPMENT DIVISION

863-956-3491, x212  
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Cheryl Burnham, Director

CSBG/ECONOMIC DEVELOPMENT  
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2202 Avenue Q  
Ft. Pierce, FL 34950

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### HEAD START/EARLY HEAD START PROGRAM OPERATIONS

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### EARLY HEAD START PROGRAM OPERATIONS (Polk County)

701 Hopson Road  
Frostproof, FL 33843

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Maria Guerrero, Director

[www.alpi.org](http://www.alpi.org)



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Tonmiel Rodriguez, Esq.

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Helping People. Changing Lives.



The Agricultural and  
Labor Program, Inc.

*community*  
**Action**  
PARTNERSHIP  
America's Poverty Fighting Network



**2022**

True to Our Mission ... Forging a New Direction During the Pandemic.

**THE AGRICULTURAL AND LABOR PROGRAM, INC.  
ELECTION PROCEDURES  
FOR  
BOARD OF DIRECTORS' OFFICERS**

The election of the following officers will be governed by the Articles of Incorporation Charter and Bylaws of The Agricultural and Labor Program, Inc., **Articles IV, VII, and IX.**

**Chairperson  
Vice Chairperson  
Secretary  
Assistant Secretary  
Treasurer**

**Voting and Eligibility Criteria**

1. An appointed non-board member will call the roll to validate the number of board members present and to determine the maximum number of votes to be expected after all votes are tallied for each office.
2. All board members present and accounted for will be eligible to vote for one (1) nominee in each officer category.
3. All votes will be by personal ballot and collected and tallied by a non-board member after each vote for each officer category.
4. Officers must win by a majority (50% plus) vote. If no candidate receives a majority vote upon the first ballot, the two (2) candidates with the highest number of votes shall have a run-off second ballot. If there is a tie following the first vote, making it impossible to determine two (2) candidates for a run-off, the Nominating Committee Chairperson shall have the authority to implement such voting procedures in order to produce two (2) candidates for a run-off and otherwise facilitate the intent of this provision in requiring election outcomes by majority vote.
5. Nothing stated herein shall be construed to preclude anyone from serving on any committee created by the Board.
6. No employee of the Agency may serve on the Board of Directors. Former employees must be out of service at least three (3) years before becoming eligible to serve on the Board of Directors.

**Nomination Procedures**

1. Nominations for each officer's position will be made from a slate presented by the Nominating Committee Chairperson and/or from the floor and recorded on a ballot sheet maintained by a non-board member.
2. Each nominee for Chairperson will be given up to three (3) minutes to give a brief statement of his/her behalf. Nominees for other positions shall be given one (1) minute each for his/her statement to the Board.



## JOB DESCRIPTION

DESCRIPTOR	RESPONSE	DESCRIPTOR	RESPONSE
POSITION TITLE	Chief Executive Officer	POSITION CODE	01
CLASSIFICATION LEVEL		EEO – 6 CATEGORY	11-1011
PAY GRADE LEVEL		PROVISIONAL PERIOD	1-Year
FLSA STATUS	Exempt	ASSIGNMENT CATEGORY	Full-Time
DIVISION/DEPARTMENT	Administration & Operations	LOCATION	Corporate

### **SUMMARY:**

Initiates projects as required to achieve the objectives of The Agricultural and Labor Program Inc.; is directly responsible to the Board of Directors for the administration of The Agricultural and Labor Program, Inc. under the guidelines of the Board of Directors and within the intent and purposes of the Articles of Incorporation and Bylaws; shall have the responsibility of providing direction for all facets of the Program's operation and shall maintain close contact with all segments of the operation throughout the geographical area being served through periodic visits and constant communication; will give regular progress reports and budget expenditures to the Board of Directors and/or funding sources; coordinates work assignments and maintains appropriate liaison with those divisional departments, consulting firms as required to complete the overall objectives; conducts or assists other staff members in conducting research studies of existing programs and procedures related to The Agricultural and Labor Program, Inc. function; seeks to secure funds from any appropriate funding source in order to achieve the objectives and intent of The Agricultural and labor Program, Inc.; initiates proposals and other documents necessary for funding requests; directs the activities of Finance Director, Head Start Program Director, Child Development Director, Child Care Program Director, Social Services Program Director, Human Resources Director, Executive Office Manager, Training and Employment Director, and Program Planning Director. Arranges regular Board of Directors meetings; attempts to develop and coordinate programs to the full utilization of all resources available to achieve stated objectives; participates in seminars, conferences and workshops to remain informed and knowledgeable of available resources.

### **ESSENTIAL DUTIES AND RESPONSIBILITIES:**

Include the following:

- Designs, develops and implements programs which meet The Agricultural and Labor Program, Inc. objectives.
- Manages the program activities and assists staff members on projects as appropriate.
- Performs research studies of existing programs and procedures to provide uniform evaluation and subsequent administration of project activities.
- Directs staff and assigns work schedules for all facets of the program's operation.
- Reports programmatic and fiscal progress to Board of Directors and arranges regular meetings.



## JOB DESCRIPTION

### ESSENTIAL DUTIES AND RESPONSIBILITIES:

- Maintains appropriate liaison with consulting firms, governmental agencies, funding sources and other organizations as required to complete stated objectives.
- Conducts research studies of existing programs and procedures related to The Agricultural and Labor Program, Inc. functions.
- Seeks to secure funds from any appropriate funding source in order to achieve the objectives and intent of The Agricultural and Labor Program, Inc.
- Initiates proposals and other documents necessary for funding requests.
- Administers the budget as it pertains to assigned projects maintaining appropriate records to reflect the effects of expenditures to the overall organization costs.
- Participates as an active member in seminars, conferences, workshops and information sessions to remain informed and knowledgeable of available resources and programs.
- Performs other duties as required.

### SUPERVISORY RESPONSIBILITIES:

Supervises directly:

- Finance Director
- Head Start Program Director
- Child Development Director
- Child Care Program Director
- Social Services Program Director
- Human Resources Director
- Executive Office Manager
- Training and Employment Program Director
- Program Planning Director



## JOB DESCRIPTION

### **QUALIFICATION REQUIREMENTS:**

To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required. Reasonable accommodations may be made to enable the individuals with disabilities to perform the essential functions.

Ability to read, analyze, and interpret common technical journals, financial reports, and legal documents. Ability to respond to common inquiries or complaints from clients, regulatory agencies, or members of the business community. Ability to write proposals for funding, reports and speeches. Ability to organize and conduct meetings. Ability to effectively present information to top management, public groups, and/or boards of directors.

Ability to calculate figures and amounts such as discounts, interest, proportions and percentages. Ability to apply concepts of basic algebra.

### **EDUCATION AND/OR EXPERIENCE:**

At least a bachelor degree in Sociology, Business Administration, Education or other related field with a minimum of six (6) years experience in administration and supervision. Applicable experience may be considered in lieu of formal education.

### **REASONING ABILITY:**

Ability to define problems, collect data, establish facts, and draw valid conclusions. Ability to interpret an extensive variety of technical instructions with several abstract and concrete variables.

### **CERTIFICATES, LICENSES, REGISTRATIONS:**

Must have valid Florida driver's license.



## JOB DESCRIPTION

### OTHER SKILLS and ABILITIES:

Must have transportation and appropriate identification upon request.

Must be able to write funding proposals

### PHYSICAL DEMANDS:

The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable the individuals with disabilities to perform the essential functions.

While performing the duties of this job, the employee is regularly required to talk or hear. The employee frequently is required to sit. The employee is occasionally required to stand; walk; use hands to finger, handle, or feel objects, tools, or controls; and reach with hands and arms.

The employee must occasionally lift and/or move up to 10 pounds.

Specific vision abilities required by this job include close vision, distance vision, depth perception, and the ability to adjust focus.

### WORK ENVIRONMENT:

The work environment characteristics described here are representative of those an employee encounters while performing the essential functions of this job. Reasonable accommodations may be made to enable the individuals with disabilities to perform the essential functions.

The noise level in the work environment is usually moderate.

<b>APPROVED BY: (Name/Title)</b>	Board of Directors
<b>DATE APPROVED:</b>	
<b>DATE REVIEWED/REVISED:</b>	

CONFIRMATION OF RECEIPT:

Signature \_\_\_\_\_

Date \_\_\_\_\_



# MEMORANDUM

**TO:** ALPI Board Members

**FROM:** Arlene Dobison, CEO

**DATE:** June 20, 2021

**SUBJECT:** CEO'S 2020-2021 Performance Evaluation Instrument

Please find enclosed, the CEO's Performance Evaluation Instrument for the period of **July 2020 - June 2021** as described below.

**Part I - CEO's Self-Evaluation; and**

**Part II - Board Member's Evaluation of CEO**

After your review, please complete **Part II** and return, electronically, to Chairperson William Holt on or before **November 12, 2021**, to [1946holt@gmail.com](mailto:1946holt@gmail.com).

If you are unable to complete the electronic copy, a paper evaluation instrument is also available for completion.

Should you have further questions and/or concerns, please contact me at (863) 956-3491, extension 204 or by e-mail at [adobison@alpi.org](mailto:adobison@alpi.org). As always, thank you for your continued support.



**THE AGRICULTURAL AND LABOR PROGRAM, INC.**  
**Winter Haven, Florida**

**EVALUATION OF THE CHIEF EXECUTIVE OFFICER**

Name Arlene Dobison Year July 2020 - June 2021

Date of Evaluation November 12, 2021 Evaluator Board of Directors

Evaluation procedures for assessing the performance of duties and responsibilities of the Chief Executive Officer is a function and responsibility of the Board of Directors. Through a system which is developed by the Executive Committee and approved by the Board, this is accomplished. The Board assumes responsibility for the development of the procedure by which the Chief Executive Officer is evaluated.

The ALPI Board of Directors views evaluation as an important personnel function and uses it in the following context:

It (evaluation) is a cooperative and continuous process involving the collection and analyzation of data for the express purpose of setting standards and redirecting effort in order to improve the quality of performance.

This evaluation is divided into three parts.

- I. Chief Executive Officer's Self Evaluation - Part I**
  - A. Role and Scope of Position
  - B. Accomplishments
  - C. Goals**(To be completed by the CEO)**
  
- II. Board of Director's Evaluation of Chief Executive Officer - Part II**
  - A. Personal Qualifications
  - B. General Characteristics
  - C. Administrative Skills
  - D. Goals and Objectives**(To be completed by individual board member)**
  
- III. Chief Executive Officer's Evaluation Summary - Part III**
  - A. Chief Executive Officer's Major Accomplishments
  - B. Areas of Greatest Strength
  - C. Areas of Weakness
  - D. Overall Board Comments and Recommendations**(To be completed by Chairperson and/or designee)**

This form was specifically designed whereby the Board evaluates those specific objectives that the Board and the Chief Executive Officer have agreed upon.



**BOARD OF DIRECTOR'S EVALUATION  
OF THE  
CHIEF EXECUTIVE OFFICER  
JULY 2020- JUNE 2021**

**PART II**

The ALPI Board of Directors will use the following scale to evaluate the overall effectiveness of the Chief Executive Officer with regard to general management skills, personal qualifications and general characteristics.

<u>Key to the Rating Scale</u>		<u>Numerical Value</u>
Exceptional (E):	Outstanding in almost every aspect.	5
Good (G):	Above average performance.	4
Satisfactory (S):	Average performance.	3
Needs Improvement (NI):	Below acceptable standards of performance	2
Unsatisfactory (U):	Unacceptable standards of performance	0

**PART II. This section is designated for each board member to rate the overall performance and effectiveness of the Chief Executive Officer.**

**A. PERSONAL QUALIFICATIONS**

1) Initiative: Initiates action - Works without close supervision. Actively attempts to influence events that can affect the achievement of goals. Does not readily accept circumstances that interfere with the attainment of goals. Regularly originates ideas and activities.

**Rating:**

2) Integrity: Maintains the expected norms of personal, social and organizational behavior. Observes the established policies and rules. Expects high ethical standards of others. Expresses understanding of the reasons for ethical behavior. Understands the importance of presenting a positive image of ALPI to the public.

**Rating:**

3) Self-Control: Maintains composure under difficult circumstances. Responds constructively to challenges and criticism. Avoids display of temper. Maintains professional demeanor while dealing with co-workers and the general public. Maintains professional demeanor when other lose their temper.

**Rating:**

4) Stress Tolerance: Performs well under pressure. Maintains composure, good judgment and adequate performance levels under pressure caused by deadline, work load, opposition or other causes.

**Rating:**

5) Work Standards: Sets high goals and standards for self, subordinates, and the program. Is not satisfied with average performance. Sets goals that are significantly beyond the present level of performance. Demonstrates an expectation of superior performance. Regularly submits work well ahead of deadlines. Regularly submits work of superior quality. Implements Board policies and directives.

**Rating:**

## **B. GENERAL CHARACTERISTICS**

1) Professional Competence: Demonstrates ability to perform the tasks associated with effective business management and personnel administration.

**Rating:**

2) Delegation: Allocates decisions and other responsibilities to the appropriate subordinates.

**Rating:**

3) Decision-making Ability: Makes realistic and rational decisions. Bases decisions on logical assumptions and relevant facts. Develops and analyzes alternative courses of action. Seeks advice and input of Board and Staff when appropriate.

**Rating:**

4) Communication: Demonstrates the ability to communicate effectively both orally and in writing. Gives oral and written instruction which result in prompt, accurate performance by staff. Keeps the Board adequately informed of developments and administrative action. Maintains appropriate liaison with external agencies.

**Rating:**

## **C. ADMINISTRATIVE SKILLS**

1) Planning and Organizing: Organizes effectively and plans ahead to meet ALPI's future needs. Establishes a course of action for meeting an objective. Sets and observes priorities. Develops schedules for activities and projects.

**Rating:**

2) Evaluation: The Chief Executive Officer conducts fair and reasonable assessment of the performance of ALPI employees under his/her direct supervision.

**Rating:** n/a

3) Management of Resources: Manage the fiscal resources of the organization. Operate within the constraints of the established budget.

**Rating:**

4) Supervision of Personnel/Training and Staff Development: The Corporate Executive Officer supervise employees closely when necessary and allow them to perform independently. Provide opportunities for training and staff development for all members of the organization.

**Rating:**

#### **D. GOALS AND OBJECTIVES**

1) Document: A written list of goals and objectives was provided to the Board.

**Rating:**

2) Appropriateness: Goals and objectives were appropriate based on the mission and the future projections of ALPI.

**Rating:**

3) Performance: Goals and objectives were met as outlined.

**Rating:**

#### **E. OVERALL COMMENTS AND RECOMMENDATIONS**

1) Board Member's Comments *Please use the following page for additional comments.*

2) Recommends Continuation of Employment    Yes            No

*DISCLAIMER: By typing your name below, you are signing this form electronically. You agree that your electronic signature is the legal equivalent of your manual signature on this form.*

Evaluator's Signature \_\_\_\_\_ Date \_\_\_\_\_

**ADDITIONAL COMMENTS**



UNITED STATES OFFICE OF PERSONNEL MANAGEMENT  
Washington, DC 20415

The Director

December 22, 2021  
CPM 2021-27

## Memorandum for Heads of Executive Departments and Agencies

From: Kiran A. Ahuja  
Director

Subject: January 2022 Pay Adjustments

The President has signed an Executive order to implement the January 2022 pay adjustments. (See Attachment 1.) Pursuant to the [President's alternative plan](#) issued under [5 U.S.C. 5303\(b\)](#) and [5304a](#) on August 27, 2021, the Executive order authorizes a 2.2 percent across-the-board increase for statutory pay systems and locality pay increases costing approximately 0.5 percent of basic payroll, reflecting an overall average pay increase of 2.7 percent. This memorandum reviews relevant portions of the Executive order.

The pay adjustment guidance in this memorandum does not apply to senior political officials that have been covered by a pay freeze. We will issue separate guidance regarding whether this pay freeze will be continued or terminated.

### New 2022 Salary Tables and Effective Date

We have posted the [new 2022 salary tables](#) on OPM's website. The 2022 pay schedules are effective the first day of the first applicable pay period beginning on or after January 1, 2022 (January 2, 2022, based on the standard biweekly payroll cycle).

### The General Schedule and Other Statutory Pay Systems

The Executive order provides an across-the-board increase of 2.2 percent in the rates of basic pay for the statutory pay systems—the General Schedule (GS), the Foreign Service schedule, and certain schedules for the Veterans Health Administration of the U.S. Department of Veterans Affairs. Special base rates for law enforcement officers at GS grades 3 through 10 are also increased by 2.2 percent. (These law enforcement officers are assigned the “GL” pay plan code.)

### Executive Schedule

Under [5 U.S.C. 5318](#), the official Executive Schedule (EX) rates of pay are increased by 2.2 percent (rounded to the nearest \$100). The [official EX salary table](#) is available on OPM's website. The official EX rates of pay are used in establishing pay limitations for employees and pay systems unaffected by any pay freeze for certain senior political officials.

## Senior Executive Service

Under [5 U.S.C. 5382](#), the minimum rate of basic pay for the Senior Executive Service (SES) rate range is adjusted to be consistent with the increase in the minimum rate of basic pay for senior-level positions under [5 U.S.C. 5376](#) (\$135,468 in 2022). The applicable maximum rate of basic pay for the SES is \$203,700 (EX-II) for SES members covered by an SES performance appraisal system certified pursuant to [5 U.S.C. 5307\(d\)](#) and \$187,300 (EX-III) for SES members covered by an SES performance appraisal system that has not been certified. An SES member with a pay rate below the minimum rate of the new SES rate range must receive a pay increase effective January 2, 2022, that brings the SES member's rate to at least the new minimum rate because an SES member may not receive less than the minimum rate of the SES rate range.

Other SES pay adjustments must generally be made based on individual performance, contribution to the agency's performance, or both, as determined under a rigorous performance management system, pursuant to [5 U.S.C. 5382](#). An agency's determination to adjust the rate of basic pay for an SES member that is approved by the end of the first pay period in January 2022 (January 15, 2022) may be made effective as of the first day of that first pay period (January 2, 2022). Determinations to adjust SES pay that are approved after January 15, 2022, will become effective at the beginning of the next pay period following the approval. OPM's regulations for setting and adjusting SES pay are available at [5 CFR part 534, subpart D](#).

## Senior-Level and Scientific and Professional Positions

The minimum rate of basic pay for the senior-level (SL) and scientific and professional (ST) rate range is increased by 2.2 percent, which is the amount of the base GS increase, and is \$135,468 in 2022. An SL or ST employee with a pay rate below the minimum rate of the new SL/ST rate range must receive a pay increase effective January 2, 2022, that brings the employee's rate to at least the new minimum rate because an SL or ST employee may not receive less than the minimum rate of the SL/ST rate range. The applicable maximum rate of basic pay is \$203,700 (EX-II) for SL or ST employees covered by a certified SL/ST performance appraisal system and \$187,300 (EX-III) for SL or ST employees covered by an SL/ST performance appraisal system that has not been certified.

As provided in [5 U.S.C. 5376\(b\)\(2\)](#) and [5 CFR 534.507\(a\)\(1\)](#), effective at the beginning of the first applicable pay period commencing on or after the first day of the month in which an adjustment takes effect under [5 U.S.C. 5303](#) in the rates of basic pay under the General Schedule, the head of an agency must adjust an SL/ST employee's rate of basic pay by an amount the agency head considers appropriate (including a zero adjustment), subject to the regulations in [5 CFR 534.507](#), and the agency's written procedures. Therefore, each agency must make an appropriate adjustment in each SL/ST employee's rate of basic pay because the General Schedule is being adjusted the first day of the first pay period beginning on or after January 1, 2022. The adjustment of an SL/ST employee's pay rate under [5 CFR 534.507\(a\)\(1\)](#) must be made effective on the first day of the first pay period beginning on or after January 1, 2022 (January 2, 2022, based on the standard biweekly payroll cycle).

## Post-Employment Restrictions

Agencies are required to notify SES members, SL and ST employees, and other individuals who are paid at a rate of basic pay equal to or greater than 86.5 percent of the rate for EX-II (\$203,700 x 86.5 percent = \$176,201 in 2022) that they are subject to certain post-employment restrictions in [18 U.S.C. 207\(c\)\(2\)\(A\)\(ii\)](#). OPM's regulations requiring notification of post-employment restrictions are available at [5 CFR part 730](#). Agencies may continue to use the sample notice OPM provided in its memorandum of January 6, 2004 ([CPM 2004-01](#)), to notify SES members, SL or ST employees, or other individuals that they are subject to the post-employment restrictions in [18 U.S.C. 207\(c\)](#). (Agencies will need to update the pay system, salary threshold, and effective date, as appropriate.) [View the sample notice](#).

## Aggregate Limitation on Pay

The aggregate limitation on pay for calendar year 2022 is \$226,300 (equivalent to the rate for EX-I). SES members and employees in SL/ST positions who are covered by a certified performance appraisal system are subject to a higher aggregate limitation on pay of the Vice President's salary (\$261,400 in 2022). (See [5 U.S.C. 5307](#) and [5 CFR part 530, subpart B](#).)

## Administrative Law Judges

The Executive order reflects a decision by the President to increase the rates of basic pay for administrative law judges (ALJs) by 2.2 percent, rounded to the nearest \$100. The rate of basic pay for AL-1 is \$176,300 (equivalent to the rate for EX-IV). The rate of basic pay for AL-2 is \$171,900. The rates of basic pay for AL-3/A through 3/F range from \$117,600 to \$162,900. The [new ALJ salary table](#) is available on OPM's website.

## Administrative Appeals Judges

Under [5 U.S.C. 5372b](#), the rates of basic pay for administrative appeals judge (AAJ) positions must be set at a rate not less than the minimum rate of basic pay for level AL-3 and not more than the maximum rate of basic pay for level AL-3 of the ALJ pay system established under [5 U.S.C. 5372](#). At [5 CFR 534.603](#), OPM's regulations link the structure of the AAJ pay system directly to the structure for level AL-3 of the ALJ pay system. The AAJ pay system includes six rates of basic pay—AA-1, 2, 3, 4, 5, and 6. These rates correspond to the rates of basic pay for AL-3/A, B, C, D, E, and F of the ALJ pay system. The [new AAJ salary table](#) is available on OPM's website.

## Locality Payments

The President’s Executive order reflects the amounts of the new locality payments for GS employees. Attachment 2 provides a table showing the 2022 locality pay percentage and total percentage increase in each locality pay area (reflecting the combined effect of the 2.2 percent across-the-board increase and the applicable increase in the locality pay percentage). Attachment 3 provides a chart showing an example of how the 2022 locality rate and total increase are computed for an employee in the Rest of U.S. locality pay area. GS locality rates are limited to the rate for EX-IV. (See [5 U.S.C. 5304\(g\)\(1\)](#) and the “Executive Schedule” section, above.) The [2022 locality pay tables for the General Schedule](#) are available on OPM’s website. [Locality pay area definitions](#) are available on OPM’s website.

## Locality Pay Extensions

On November 30, 2021, OPM issued a memorandum on behalf of the President’s Pay Agent (the Secretary of Labor and the Directors of the U.S. Office of Management and Budget and OPM) that continues GS locality payments for ALJs and certain other non-GS employee categories in 2022. The [memo](#) is available on OPM’s website.

## Cost-of-Living Allowance Rates for Nonforeign Areas

As provided under the Nonforeign Area Retirement Equity Assurance Act of 2009 (subtitle B of title XIX of the National Defense Authorization Act for Fiscal Year 2010 (Public Law 111-84, October 28, 2009)), employees in nonforeign areas entitled to cost-of-living allowances (COLAs) have corresponding reductions in their COLAs when locality rates increase. The [locality and COLA rates in each COLA area](#) are available on OPM’s website.

## Special Rates

We are issuing a separate memorandum announcing the results of OPM’s annual review of special rates and the 2022 special rate adjustments.

## Prevailing Rate Pay Adjustments

We are issuing a separate memorandum on pay adjustments for certain prevailing rate (wage) employees.

## 2022 Premium Pay Caps

Under [5 U.S.C. 5547\(a\)](#) and [5 CFR 550.105](#), GS and other covered employees may receive certain types of premium pay in a biweekly pay period only to the extent that the sum of basic pay and such premium pay for the pay period does not exceed the greater of the biweekly rate payable for (1) GS-15, step 10 (including any applicable locality payment or special rate supplement), or (2) the rate payable for EX-V (\$165,300 in 2022). In certain emergency or

mission-critical situations, an agency may apply an annual premium pay cap instead of a biweekly premium pay cap, subject to the conditions prescribed in law and regulation. (See [5 U.S.C. 5547\(b\)](#) and [5 CFR 550.106–550.107](#).) We have posted the [2022 biweekly premium pay caps fact sheet](#) on OPM’s website.

### **Adjusting Retained Rates**

Certain employees are entitled to retained rates above the applicable rate range under [5 U.S.C. 5363](#) and [5 CFR part 536](#). As provided in [5 U.S.C. 5363\(b\)\(2\)\(B\)](#) and [5 CFR 536.305](#), when the maximum rate of the highest applicable rate range for an employee’s position of record is increased while the employee is receiving a retained rate, the employee is entitled to 50 percent of the amount of the increase in that maximum rate. An [example of adjusting a retained rate](#) can be found in the fact sheet on OPM’s website.

### **Pay Administration**

We have updated examples of pay computations to reflect the pay adjustment for GS employees:

- [Examples of January 2022 Pay Computations](#)
- [How to Compute Rates of Pay](#)
- [How to Compute Fair Labor Standards Act Overtime Pay](#)

### **Questions**

Agency headquarters-level human resources offices may contact OPM at [pay-leave-policy@opm.gov](mailto:pay-leave-policy@opm.gov). Employees should contact their agency human resources offices for assistance.

### **Attachments**

cc: Chief Human Capital Officers (CHCOs), Deputy CHCOs, and Human Resources Directors

**Salary Table No. 2022-EX**  
**Rates of Basic Pay for the Executive Schedule (EX)**

**Effective January 2022**

Level	Rate
Level I	\$226,300
Level II	\$203,700
Level III	\$187,300
Level IV	\$176,300
Level V	\$165,300

**Note: Section 160 of the Continuing Appropriations Act, 2022, as added by section 101 of the Further Continuing Appropriations Act, 2022, continues a freeze on the payable rates of pay for certain senior political officials through February 18, 2022 (unless an earlier end date is established by subsequent law). For more information, please see <https://www.chcoc.gov/content/continued-pay-freeze-certain-senior-political-officials-5>.**



**THE AGRICULTURAL & LABOR PROGRAM, INC.  
POLICIES AND PROCEDURES MANUAL**

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Forms used in the administration of human resources policies and procedures

## BACKGROUND SCREENING

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### 312 BACKGROUND SCREENING

#### I. Purpose

To clarify and expand the Agency's applicant and volunteer screening and evaluation process to ensure the ongoing protection of minor children (under 18 years of age) and the elderly who ALPI serves in its programs and operations. Employees/volunteers may be periodically screened.

#### II. Policy

All new and existing employees who work with children 18 years old and under and the elderly will have a criminal background check and other background information verified as a condition of employment and continued employment.

Any person who works with or serves children/elderly, background screening, by statute, must not have been found guilty of, regardless of adjudication, or entered a plea of nolo contendere or guilty to, any offense prohibited under the Florida Statutes, Chapters 435 and 430.

Non-instructional contractors and their employees, including but not limited to vendors, individuals or entities under contract with the organization who may have access to students/children/elderly are subject to background screening under the provisions of Florida Statutes, Sections 1012.465, 1012.467, and 1012.468 for children and Section 430.0402 for the elderly.

#### III. Procedure

##### Definitions

**Children** – Any person under the age of 18

**Elderly** – Any person 60 years of age and older.

##### Employee

Any person employed by ALPI, whether full- or part-time, that is required by law to be screened pursuant to the provisions of Florida Statutes, Chapter 435 for children and 430 for the elderly, and applicable existing agency policies and procedures.

##### Volunteer

Any person, eighteen years or older, parent, community worker, or other who participates in the work of the Agency, full-time or part-time, paid or unpaid, working directly with children under the age of 18 or the elderly 60 years of age or older.

## **BACKGROUND SCREENING**

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### **Criminal History Check**

Verifying that the selected applicant or employee does not have any undisclosed criminal history in every jurisdiction where the applicant or employee currently resides or has resided.

### **Level 1 Background Screening**

The Florida Department of Law Enforcement will conduct a search of state and local records.

### **Level 2 Background Screening**

Security background investigations shall include, but not be limited to, fingerprinting for all purposes and checks statewide, criminal and juvenile records checks through the Florida Department of Law Enforcement, and federal criminal records checks through the Federal Bureau of Investigation and may include local criminal records checks through local law enforcement agencies.

#### **A. General Screening Standards**

1. All employees and/or volunteers required by law to be screened shall undergo background screenings as a condition of employment/volunteering and continued employment/volunteering and may be screened periodically.
2. Screenings shall include fingerprinting, statewide criminal records checks through the Florida Department of Law Enforcement, and federal criminal records check through the Federal Bureau of Investigation, and may include local criminal records checks through local law enforcement agencies.
3. All applicants in the selection process and volunteers in positions for which employment screening is required must submit complete information necessary to conduct a screening and obtain clearance prior to the start of work.
4. All persons denied and/or terminated shall be notified in writing, stating the specific record which indicates noncompliance including but not limited to the Florida Statutes, Chapters 430 and 435.
5. Any person who is required to undergo employment screening and who refuses to cooperate in such screening or refuses to submit the information necessary to complete the screening, including fingerprints when required, shall be disqualified for employment in such position, or if employed shall be terminated.

## **BACKGROUND SCREENING**

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### **B. Employee Screening**

1. State law requires a fingerprint criminal background check be done on all potential Child Care employees and employees working with the elderly through a local law enforcement agency.
2. Employees and potential applicants must be notified that a Level 2 criminal background check is required before they can begin work.
3. All employees who have as a part or all of their work assignment regular contact with the elderly or children under the age of 18 must have a background screening completed satisfactorily before they can begin work.

### **C. Volunteer Screening**

1. All volunteers with a service assignment in part or in whole involving regular contact with the elderly or children under the age of 18 must have a background screening completed satisfactorily before beginning work. Volunteers may be periodically screened.
2. Management must notify a potential volunteer that a criminal background check is necessary before anyone will be allowed to work with children or the elderly. Each must submit required information to complete the background screening.
3. If a volunteer has no convictions that would prevent him or her from serving with children or the elderly, the volunteer will be notified and appropriately assigned to duty.
4. If a volunteer has a disqualifying conviction(s) in accordance with Florida Statutes, Chapters 430 or 435, the volunteer will not be re-instated or hired and will be notified in writing by the Human Resources Director stating the specific record, which indicates noncompliance.

### **D. Rechecks**

1. All employees and volunteers who continue to have regular contact with the elderly or children, as part or all of their volunteer service assignments, must undergo a background screening when requested by the Agency.
2. Current employees who fail a background screening will be terminated and given notice in writing, stating the specific offense and violation or noncompliance including but not limited to the Florida Statutes, Chapters 430 and 435.

## **BACKGROUND SCREENING**

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### **E. Disqualifying Offenses**

1. Any individual convicted of a crime in accordance with the Florida Statutes Chapters 430 and 435, including those listed below is ineligible to participate in any ALPI volunteer service positions:
  - a. Conviction of any crime that results in the death of the victim.
  - b. Conviction of any crime involving sexual assault or molestation.
  - c. Conviction of any felony assault/battery
  - d. Conviction of any misdemeanor assault/battery charge in the last five years.
  - e. Conviction of three or more misdemeanor assault/battery charges.
  - f. Conviction of any felony distribution or possession with to distribute marijuana or narcotic drugs.
2. Employee guidelines in Chapters 430 and 435, Florida Statutes.

### **F. Appeals Process**

It is the responsibility of the effected employee to contest his or her disqualification or to request exemption from disqualification in accordance with the State statutes.

### **G. Authorization for Release of Background Information Form**

Prior to obtaining initial and updated background screening, employee/volunteer must sign the Privacy Policy Acknowledgement Form provided by the Care Provider Background Screening Clearinghouse. This form is found on the Clearinghouse website and must be sent to Human Resources with results of screening.

### **H. Reporting Arrest and New Charges**

All employees are required to report any new charges, and or arrest within 72 hours of the event. Failure to report, can result in disciplinary action up to, immediate termination.

## RECRUITMENT

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### 325 RECRUITMENT

#### I. Purpose

To assist management personnel in the proper discharge of their hiring responsibilities.

#### II. Policy

To give equal opportunity to all job applicants and employees in compliance with current laws and regulations

#### III. Procedure

The guide below is intended to assist management in the recruitment and interview process. It provides "Do's" and "Don'ts" for technical compliance.

#### A. Reference to race, skin color, religion, national origin, sex, same sex marriage, sexual orientation, disability are prohibited in the conduct of recruitment and interview processes.

##### 1. DO NOT make references to race, skin color, religion, national origin, sex same sex marriage, sexual orientation, disability in any of the following circumstances:

- a. Print, publish, announce or permit to be printed or published any specification to job announcements or advertisement.
- b. Inquiries which may indirectly request such information for pre-employment purposes;
- c. ALPI management or staff make any statements or take any action on behalf of the agency which would tend to discourage persons seeking employment, training or advancement, or the use of facilities or privileges.
- d. Refuse or fail to hire, promote, approve for training or apprenticeship any qualified person for these reasons.
- e. Differentiate among employees in setting terms, compensation, conditions or privileges of employment.
- f. Segregate, classify, or limit employees on these terms.
- g. Retaliate against any person who has filed a complaint of discrimination opposed any discriminatory practice or participated in any proceedings under the law.
- h. Establish any specifications or qualifications for employment which are unrelated to the job and would tend to exclude qualified persons of a particular group.

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**B. OBSERVE THE FOLLOING PRACTICES:**

1. Guide to successful recruitment and placement of staff
  - a. The phrase “EOE/AA” will appear in all recruitment advertising.
  - b. Conduct staff and employee conferences, as needed, to review the requirements of law, Agency policy, and compliance procedures, and to persuade them to give their full cooperation.
  - c. Inform recruiting sources of the Agency’s desire to employ qualified persons of all racial, religious and ethnic groups.
  - d. Pass on all applications to the Human Resources Director for certification of eligibility for position openings,

**C. INTERVIEW TECHNIQUES**

Interviewing techniques should be reviewed to insure that every person who interviews job applicants are thoroughly familiar with the law and what it means. Make sure the following permissible and non-permissible pre-employment questions are understood:

**1. Illegal Pre-employment Inquiries:**

**DO NOT**

- a. Ask “of what country are you a citizen”? (You may ask to see a copy of driver’s license)
- b. Inquire whether an applicant is married, single, divorced, engaged, etc. Number and age of children? Any questions concerning pregnancy.
- c. Ask the sex of the applicant or any other inquiry which would indicate sex. Sex is not a bona fide occupational qualification. Nor can sex be used as a factor for determining if an applicant, male or female, will be satisfied in a particular job.
- d. Require that applicant submit photograph or that a photograph is optional before hiring (A photo ID is required with I-9)
- e. Require that applicant produce proof of age in the form of a birth certificate or baptismal record, if not a minor.
- f. Ask for the name and address of relative to be notified in case of an accident or emergency during interview process. (Needed after hiring)
- g. Ask for the names or relationships of persons with whom the applicant resides. Does applicant own or rent home? Any inquiry into foreign addresses that would indicate national origin.
- h. Inquire into general military service. Type of discharge.

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- i. Ask any questions which tend to identify an applicant's age.
  - j. Ask the question, "Have you ever been arrested?" (Instead, review job application for criminal history)
  - k. Become curious about a person's disabilities.
  - l. Inquire about the applicant's color of skin, eyes, hair or any other questions that directly or indirectly indicates race or skin color.
  - m. Ask any question concerning applicant's credit rating, charge accounts, etc.
  - n. Ask any question that is not job related, nor necessary for determining an applicant's eligibility for employment, nor which directly or indirectly results in limitation of job opportunity in any way.
  - o. Ask specifically for the nationality, racial or religious affiliation of a school on application.
  - p. Ask about the applicant's native language. How applicant acquired ability to read, write, or speak a foreign language or any other inquiries pertaining to national origin, descent, parentage, or lineage.
  - q. Inquire as to applicant's religious denomination or affiliation, religious denomination or affiliation, religious holiday, or "Do you attend church?"
  - r. Inquire into applicant's sexual orientation or same sex marriage status.

## 2. Legal Pre-employment Inquiries:

### PLEASE ASK IF REQUIRED:

- a. Have you ever worked for this company under a different name?
- b. What is your place and length of current and previous residence and how long have you been a resident of state or city?
- c. Are you a citizen of the United States? Can you, after employment, submit proof of U. S. citizenship?
- d. If you are not a citizen of the United States, have you the legal right to remain permanently in the United States? Do you intend to remain permanently in the United States? If not a citizen, are you prevented from lawfully becoming employed because of visa or immigration status?

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- e. Can you submit a birth certificate or other proof of age? Make a statement that is subject to verification that applicant's age meets legal requirement? (I-9 Form)
  - f. What is your academic, vocational or professional education and school attended? Inquire into language skills such as reading, speaking and writing foreign languages.
  - g. Have you ever been convicted of a felony? Inquiry should relate reasonably to fitness to perform a particular job.
  - h. Is the type of military education, training and experience in the armed forces of the United States related to the job for which you have applied?
  - i. What are the names of your relatives already employed by ALPI?
  - j. To what organizations do you belong, other than those where the name or character indicates the race, religion, creed, skin color, national origin, or ancestry of its members?
  - k. do you have any disabilities or health problems which may affect work performance or which we (employer) should consider in determining job placement?
  - l. By whom were you referred for a position here? Who suggested you apply for a position here? Names of persons willing to provide character and/or professional reference for the applicant.
  - m. A statement that the offer may be made contingent on a physical examination or such other requirement as a background screening check.
  - n. A statement that a photograph may be required after hiring for identification.

#### **D. Filling Job Vacancies**

The Human Resources Director will be notified of all vacancies by use of the Personnel Requisition form within 3 days of vacancy.

##### **1. Advertisements in-house**

Written job announcements prepared by the Human Resources Department will be placed on site location bulletin boards for 5 working days or placed in a Job Vacancy notebook for viewing by employees only.

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2. External Advertisements

Vacancies may be advertised in the media, internet and with agencies.

3. Applications Screened

Applications will be screened by the Human Resources Director and certified as eligible for vacancies based on qualifications. Referrals will be made to the appropriate manager.

4. Interviews

Interviews will be conducted by the appropriate manager, supervisor or designated interview panel.

a. Interview Panel

An interview panel has to be made up of staff in positions above that of the grade level of the vacant position for objectivity and fairness.

b. Interview Questions

Standard questions should be prepared from the job description. Each applicant must be asked the same prepared questions for objectivity and fairness.

c. Interview Rating Form

Each interviewer should be objective and fair in the review of each applicant and rate each applicant accordingly.

d. Composite Score

After each interviewer has scored the applicant, the total of each interviewer's score should be added together and divided by the number of interviewers for a composite score.

e. Selection of Applicant

The applicant with the highest score is the choice. If interview panel group, the applicant with the highest composite score.

5. Reference Checks

Each applicant selected must provide three references. At least one business reference, preferably the latest supervisor of the applicant or other business contact. Answer questions from the telephone reference form. The applicant may bring in two personal references. However, there is no substitute for the business reference call.

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## **E. Recommendations for Hire**

Department Directors will submit a Recommendation for Hire to the Human Resources Director with the reasons why the chosen applicant was selected, which includes a review of qualifications.

## **F. Head Start/Early Head Start Policy Council Approval/Disapproval**

The Head Start/Early Head Start Program Director will submit to the Council the applicant hire package for approval/disapproval.

## **G. Hiring Decisions**

The Human Resources Director and Finance Director make recommendations for hire after reviewing recommendation for hire packages received from department directors. The Human Resources Director reviews hiring information for appropriate qualifications and salary determination. The Finance Director reviews hiring information for budget appropriation. Recommendations are passed on to the CEO for approval. The Human Resources Director will notify department directors of hiring decisions by copy of the Personnel Change Notice following the review process. Department Directors will notify applicants with an employment offer.

## **H. Employment Rejection Letter**

Department Directors will submit applications rejected to the Human Resources Director who will notify each applicant with a letter of rejection by mail.

## **I. New Hire Forms**

Department Directors will submit information to the Human Resources Director to verify that new hire requirements have been followed. For example, in order to hire an individual, the following documents are required:

1. \*Personal Change Notice
- \*Recommendation For Hire
- \*Employment Application
- \*Diploma and/or Degree
- \*3 Reference Checks/1 or 2 Former Employer References/1 or 2 Personal Reference Forms
- \*Orientation Checklist
- \*I-9 completed with verification of citizenship status, i.e.,
  - Birth Certificate
  - Passport
  - Social Security Card or
  - Driver's License
- \*Deduction Waiver
- \*Employees Withholding W-4
- \*Personal Data
- \*Signed Job Description
- \*Group Insurance Applications

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- \*Special Rights Accept/Reject Health Insurance Plan
  - \*Premium Savings Plan Authorization
  - \*Drug Free Workplace
  - \*Medical Questionnaire
  - \*Time Sheet/Effort Reporting
  - \*Code of Business Conduct Pledge Statement
  - \*Employment of Relatives Policy
  - \*New Employee Orientation Checklist
  - \*Weekly Work Hour Schedule
  - \*Handbook Receipt and Acknowledgement
  - \*Affordable Health Care Exchange Notice

2. Additional Forms Required for Hire in Child Care and Head Start are as follows:

- \*Local Law enforcement check
- \*Child Abuse background check
- \*Fingerprints
- \*Physical Examination Results
- \*TB Test Results
- \*Affidavit of Good Moral Character
- \*Corporal Punishment
- \*Discipline Policy
- \*Child Abuse/Neglect Training Pamphlet & Acknowledgment

**J. Clearance Register**

In order to remain employed, Child Care and Head Start staff must clear the Federal, State and Local Child Abuse Register. Employees not clearing the register will be terminated. (See Standards of Conduct and Florida Administrative Code for Child Care Standards).

## TERMINATIONS

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### 285 TERMINATIONS

#### I Purpose

ALPI has a considerable investment in its staff and seeks to maintain staff.

#### II Policy

An employee is requested to submit a written notification to the supervisor at least two (2) weeks in advance of resignation.

Any terminated employee who has completed regular probation may appeal his/her termination.

Prior to any recommendation for termination, program management is to provide the counseling and/or training an employee needs to improve his or her performance or conduct to the level necessary for removal from probation. Failure to develop and carry out an adequate counseling or training plan will be grounds for reversal of any adverse action.

The Board of Directors will initiate termination or disciplinary suspension against the Chief Executive Officer.

#### III Procedure

##### A. Resignation

Employee may submit a notice of resignation two weeks in advance.

1. Supervisor acknowledges notice of resignation.
2. Department Director submits a Personnel Change Notice to Human Resources recommending termination of employee and submits a Position Requisition to fill the vacancy
3. The Head Start/Early Head Start Policy Council reviews any requests for resignation following approval by the Chief Executive Officer, and recommends or approves action.

## TERMINATIONS

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4. The employee prepares time sheet and turns in all assigned agency property on the last day of work.
5. Supervisor will complete an Exit Interview prior to employee's last day and submit completed form with final time sheet.
6. An employee may be given two week's pay and may be required to discontinue work immediately in lieu of working during the two-week notice period.

### **B. Involuntary Separation/Lay-Off/Furlough**

Reasons for non-disciplinary discharge, or "termination without prejudice," include, but are not limited to:

1. Reduction of labor force
2. Organizational changes
3. Lack of funding

### **C. Resignation During Separation/Lay-Off/Furlough**

An option to resign is available for those who prefer not to be on recall status. In this case, an employee must submit a letter of resignation and may become eligible to receive benefits such as retirement pay-out, etc.

### **D. Disciplinary Termination For Cause**

This procedure addresses disciplinary termination for policy violations.

#### **1. Dismissal for Violation of Standards of Conduct**

Disciplinary dismissal for gross neglect or infractions(s) of standards of conduct are conducted in the following manner:

##### **a.) Dismissal-disciplinary termination for cause**

A termination for cause is initiated when an employee exhibits unsatisfactory performance/behavior and acknowledges offense that will justify immediate termination.

## TERMINATIONS

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### E. Dismissal Process

Infractions management deems to be sufficiently serious, or continued failure to respond appropriately to prior corrective action, support a recommendation for discharge. The approval of the Chief Executive Officer must be obtained prior to the discharge of an employee under any circumstance.

1. Termination according to the following steps will satisfy fair labor employment practices:
  - a) A Disciplinary Action Report must accompany any request for corrective action.
  - b) A discussion must occur between the supervisor and employee as soon as possible following the infraction to ensure proper communication.
  - c) Once the Department Director, Manager or supervisor determines the termination of an employee is necessary, the Department Director recommends termination to the Chief Executive Officer.
  - d) A Personnel Change Notice, Disciplinary Action Report, and incident/accident report are sent to the Human Resources Director for review.
  - e) Supporting documents are presented to the Chief Executive Officer by the Department Director or Human Resources Director.
  - f) The Chief Executive Officer may recommend an alternative action. If the Chief Executive Officer concurs with the recommendation to terminate, the Personnel Change Notice is signed. The employee is notified of dismissal by the Department Director upon receipt of the signed Personnel Change Notice from the Human Resources Director.
  - g) The Head Start/Early Head Start Policy Council reviews any requests for terminations or dismissal(s) following review by the CEO.

#### 2. Termination of a Department Director

If the termination of a Department Director is necessary, the Chief Executive Officer initiates the termination and presents data to the Board of Directors. If the Board concurs with the recommendation to terminate, the Chief Executive Officer will follow through with the termination proceedings.

## TERMINATIONS

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### a) Head Start/Early Head Start Policy Council Review

If the termination of the Head Start Director or the Early Head Start Program Manager is necessary, the Chief Executive Officer initiates the termination and presents data to the Head Start/Early Head Start Policy Council, which reviews any such recommendation prior to review by the Board of Directors. The Head Start/Early Head Start Policy Council will review, and approve or disapprove the action. If there is concurrence with the recommendation to fire, the Board of Directors will review the request. If in agreement, the Chief Executive Officer will initiate the termination proceedings. If the Head Start/Early Head Start Policy Council does not approve the termination as requested the CEO, the CEO will request a mediator or Board Representative to intercede in obtaining a resolution or unanimous agreement. The CEO will follow through with the decision of the Policy Council.

- b) Termination proceeding for the Director or Manager must be submitted in writing to the Regional Offices of HHS 30 days prior to termination.

### 3. Letter From Chief Executive Officer

Any terminated employee who has completed regular probation may appeal his/her termination.

- a) By responding to a letter sent by the Chief Executive Officer acknowledging the the termination, the former employee may respond within ten (10) days of receipt of the letter with a rebuttal.
- b) The CEO will review any information presented and either request a follow-up hearing or send a letter confirming the termination. If in the information presented there are questions or grounds for a change in decision, the CEO will take the appropriate action.

## F. Appeal Process

Since a probation can result in termination or demotion to a lower pay category, the probation can be appealed to the Chief Executive Officer under the following circumstances:

1. Full-time employees who have completed a regular probation period and were demoted, may appeal through the Grievance procedure.

## **TERMINATIONS**

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2. Probationary employees who have not completed their initial probation period are not eligible to use the Grievance Procedure available for regular full-time employees to grieve a termination or disciplinary action.



## GRIEVANCE

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### 170 GRIEVANCE

#### I Purpose

To ensure employees are treated in a fair and impartial manner, a grievance procedure has been established to resolve problems quickly, fairly, and equitably.

To make available a systematic mechanism in which to resolve employment problems, complaints, conflicts with regulations, Agency policies and procedures, and or program policies and procedures.

#### II Policy

Failure to follow the steps outlined through the resolution of conflict can result in disciplinary action, up to and including termination.

#### III Procedure

A problem-solving mechanism in which every attempt is made to resolve issues through effective and efficient communications processes between employees and management via a multi-step process.

##### Definition of Grievance

An employee's unresolved dissatisfaction with any aspect of working relationships in which the employee chooses to bring the concern to the attention of the immediate supervisor.

#### A. Steps for Compliance with Grievance Procedure

##### Use Employee Grievance Form (Step I)

The aggrieved employee must present his/her grievance in writing to the supervisor on the Employee Grievance Form within seven days of the action referencing the complaint. The grievance is to be specific, stating the nature of the concern and what he/she feels is the appropriate remedy.

#### B. Supervisor Responsibility ( 5 working Days) (Step II)

The supervisor must, within five (5) working days of receipt of the grievance, have a meeting with the employee to discuss the grievance.

**GRIEVANCE**

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**C. Supervisor Responsibility ( 5 working Days) (Step III)**

The supervisory decision regarding the disposition of the grievance shall be conveyed to the employee within five (5) working days following the meeting in writing.

**D. Supervisor Responsibility ( next 5 working Days) (Step IV)**

If the employee has not heard from the supervisor within five (5) working days after the initial meeting or is dissatisfied with the decision, the employee may present the grievance to the next level of administrative supervision, following the chain of command within in the .

**E.. Department Director Responsibility (Step V)**

Upon receiving the grievance, the Department Director must meet with the employee within five (5) days of receipt of the grievance.

1. The department director's decision must be in writing and conveyed to the employee within five (5) working days after the meeting.
2. If the employee is not satisfied at this level, the employee may file the grievance with the Chief Executive Officer within five (5) days of receipt of the decision.

**F. Chief Executive Officer Responsibility (Step VI)**

Upon receiving the grievance, the Chief Executive Officer must meet with the employee within five (5) days of receipt of the grievance. A decision will be conveyed to the employee in writing within five (5) working days. If the employee is not satisfied with the decision of the Chief Executive Officer, a hearing may be requested with the Executive Committee of the Board of Directors within five (5) working days of receipt of the CEO's decision.

**G. Head Start/Early Head Start Policy Council (Step VII)**

Head Start and Early Head Start employees will submit their grievance to the Policy Council prior to requesting a meeting with the Board of Directors. All steps - II -VI must be followed prior to submission to the Policy Council. The Policy Council has ten (10) working days to schedule at least one meeting and make a recommendation.

**(See Head Start Policies and Procedures for more detail)**

**H. Board Of Directors Review (Step VIII)**

Upon receipt of a request for a meeting, the Board will review the grievance. The decision of the Board of Directors is final. The employee will be notified of the Board's decision within thirty (30) days.

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# IMPASSE PROCEDURE

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ALPI HEAD START/EARLY HEAD START  
OPERATIONAL POLICIES AND PROCEDURES  
**PART 1 – PROGRAM GOVERNANCE**

SUBJECT	<b>Program Governance</b>
45 CFR SECTION:	1301.6
PERFORMANCE OBJECTIVE:	To establish and maintain a procedure to settle disputes and resolve impasses between the ALPI’s Board of Directors and the Head Start and Early Head Start Policy Council.

**§1301.6 IMPASSE PROCEDURES**

(a) ALPI will establish and maintain procedures that facilitate a meaningful consultation about decisions of the governing body (Board of Directors) and the policy council. These procedures allow members to solve internal disputes between the governing body (Board of Directors) and policy council in a timely manner that include impasse procedures. These procedures include:

- Demonstrate that the governing body (Board of Directors) considers proposed decisions from the policy council and that the policy council considers proposed decisions from the governing body (Board of Directors);
- If there is a disagreement, require the governing body (Board of Directors) and the policy council to notify the other in writing why it does not accept a decision; and
- Describe a decision-making process and a timeline to resolve disputes and reach decisions that are not arbitrary, capricious, or illegal.

(b) If ALPI’s decision-making process does not result in a resolution and an impasse continues, the governing body (Board of Directors) and policy council will select a mutually agreeable third party mediator and participate in a formal process of mediation that leads to a resolution of the dispute.

(c) ALPI, if not resolution is reached with a mediator, the governing body (Board of Directors) and policy council will select mutually agreeable arbitrator whose decision is final.

**OPERATIONAL PROCEDURES**

1. When ALPI Head Start/Early Head Start Policy Council and the Board of Directors (governing body) reach an impasse on issues requiring the approval of both bodies, the following procedures will be implemented:

- The Chairperson of the Board of Directors may elect to schedule a jointly called meeting of the Board with the full membership of the Policy Council, and/or the chairpersons of each body may each appoint three members to a “Dispute Resolution” Committee, functioning as a special committee of the Board of Directors. The joint bodies or committee shall meet at a mutually agreeable time and place to discuss the impasse issue(s) informally, and institute all good faith efforts to resolve the dispute in a manner acceptable to both bodies.
- Recommendations developed and approved unanimously by the Dispute Resolution Committee and/or recommendations arising from the joint meeting will be presented for approval to both bodies.
- If the committee and/or combined bodies fail to negotiate the issue, formal procedures shall be implemented. All mediation or subsequent dispute resolution discussions will remain confidential among members of the two bodies.
- The Dispute Resolution Committee, if not previously established, will be appointed by the chairpersons of each body, and meet to select a qualified neutral third party to serve as a Mediator to assist the bodies in resolving the impasse. The Mediator shall not arbitrate, judge nor decide the dispute for the parties, but will work to gain the trust of both parties and then use his/her knowledge and skills to help the parties focus their interest and goals in order to come to an agreement that meets their individual and mutual objectives. If the committee cannot agree upon a mediator, chairpersons of the both bodies will recall members and appoint new representatives to the committee.
- The mediator is strictly prohibited from discussing the case with anyone outside the mediation process, so that no one who might be involved in a possible later adjudication will have any knowledge of what happened during mediation. Fees for mediation services may be charged to the program grant and/or discretionary funds of the Board of Directors.
- Although either body is free to consult with legal counsel at any time, the mediation process shall not require parties to have attorneys.
- In the event that the impasse cannot be resolved by mediation, the Board of Directors will notify the assigned Program Specialist at the Regional Office. Both bodies may elect to enter into binding arbitration (by individual panel) following procedures developed and approved by both Policy Council and Board of Directors. If either party refuses to engage in arbitration, the Board of Directors may elect to enter the judicial system to resolve disputes.

2. During the course of informal and formal efforts to resolve the dispute, no related actions shall be implemented unless approved by both bodies. If the conflict places the program or agency in jeopardy of losing funding, violation of local, state and federal statutes, endangering the health and safety of staff, parents and/or legal guardians, participants, or the public; or involves an emergency situation requiring immediate action, the Board of Directors has the authority to seek approval from the funding agency, local, state, or federal authorities (if applicable) and/or the judicial system to implement such actions as it deems warranted.
3. Once the dispute is resolved, such corrective actions or reparations deemed by the mediated, arbitrated, or judicial decision accepted shall be implemented.

## CODE OF BUSINESS CONDUCT

### 140 CODE OF BUSINESS CONDUCT

#### I Purpose

To conduct business activities and transactions with honesty and integrity, and in accordance with moral, ethical and legal standards. The Board of Directors of ALPI has adopted the following Code of Business Conduct which shall apply to the agency officers, all agency employees or agents. Conflicting interests can be financial, personal relationships, status or power.

A code or standard of conduct shall be maintained to prohibit real and apparent conflicts of interest that may arise among officers, employees, or agents and to prohibit the solicitation and acceptance of gifts or gratuities by officers, employees, or agents for their personal benefit in excess of minimal value.

#### II Policy

ALPI shall maintain a code of conduct which shall govern the performance of its officers, employees, and agents including adherence to but not limited to the following:

- a. Any services to be rendered must be by written contract and approved by the Chief Executive Officer;
- b. Business activities and transactions are to be conducted with honesty and integrity, and in accordance with moral, ethical and legal standards;
- c. Funds or assets of the agency shall not be used for political campaign contributions. Grant monies received through the agency will not be used for lobbying efforts;
- d. Political campaign contributions will not be made by or on behalf of the agency, which includes direct expenditures or contributions, in cash or property, to candidates for nomination or election to public office or to political parties, for indirect assistance or support;

- e. Personal contracts with agency contractors and vendors are prohibited. Employees and agents are to engage in legitimate approved written contracts that describe specific services and not solicit gifts or private recognition from contractors;
- f. Employees or agents are not to have a direct or indirect personal interest in the business of any supplier or client;
- g. Employees or agents are not to accept any salary, fee, commission nor other compensation from any supplier, or client;
- h. Employees or agents are not to accept any personal gratuities, favors, or anything of significant monetary value from contractors or potential contractors;
- i. A contractor, vendor, employee nor agent shall be retained to perform any service except for legitimate business purposes and in accordance with applicable policies;
- j. No department nor program is excused from the manifestation of this Code.
- k. No employee nor agent is excused from the manifestation of this Code in everyday practices and operations.
- l. Board members, employees and agents are prohibited from receiving gifts, fees, loans, or favors from suppliers, contractors, consultants, or financial agencies, which obligate or induce the board member, employee and agent to compromise responsibilities to negotiate, inspect or audit, purchase or award contracts, with the best interest of ALPI in mind.
- m. Board members, employees and agents are prohibited from knowingly disclosing information about ALPI to those who do not have a need to know or whose interest may be averse to ALPI, either inside or outside ALPI. Nor may board members, employees or agents in any way use such information to the detriment of ALPI.
- n. Board members, employees, or agents may not have a significant financial interest in any property which ALPI purchases, or a direct or indirect interest in a supplier, contractor, consultant or other entity with which ALPI does business.

### **III Procedures**

To the extent permissible under the State or local law, rules and regulations, or if ALPI determines that it has the legal and practical capacity for enforcement, such standards as stated in the Personnel Policies, Fiscal Policies and Board Manual shall provide for appropriate penalties, sanctions, or other disciplinary actions to be applied for violation of such standards either by ALPI's officers, employees, and agents, or by its contractors or their agents. Including but not limited to the following:

#### **A. Reporting Improper Practices by Employees and Agents**

1. Employees and agents have a duty to report, verbally or in writing, promptly and confidentially, any evidence of improper practice of which they are aware. The term "improper practice" means any illegal, fraudulent, dishonest, negligent, or otherwise unethical action arising in connection with the agency operations or activities.
2. Reports of improper practice should be submitted through the lines of administrative supervision except when the alleged impropriety appears to involve a management employee. In such cases, reports should be referred to the Chief Executive Officer, who will advise the Board of Directors, Policy Council, and grantee agencies when applicable.

#### **B. Reporting of Improper Practices by Board of Directors/Governing Bodies**

1. Any possible conflict of interests on the part of any board member should be disclosed to the other board members and made a matter of record, either through an annual procedure or when the interest becomes a matter of board action.

2. Any board member having a conflict of interests or possible conflict of interests should not vote or use his/her personal influence on the matter, and he/she should not be counted as part of a quorum for the meeting. The minutes of the meeting should reflect that a disclosure was made, the abstention from voting and the quorum situation.
3. These restrictions should not be construed as preventing the board member from briefly stating his/her position in the matter, nor from answering pertinent questions of other board members, since his or her knowledge could be of assistance to the deliberations.

**C. Methods to be used to ensure that all officers, employees, or agents of the organization are aware of the code of conduct include but not limited to the following:**

1. All board members will be required to complete the "Conflict of Interests Statement." This policy will be reviewed by the board annually and given to each new board member for signature during orientation.
2. A signed "Code of Business Conduct Pledge Statement" will be completed and maintained on file for all employees, agents, and vendors/contractors during business with the organization for future reference.

## DRIVING AGENCY VEHICLES ON AGENCY BUSINESS

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### 145 DRIVING AGENCY VEHICLES ON AGENCY BUSINESS

#### I. Purpose

Employees whose duties include driving may be assigned an agency-owned vehicle for use in carrying out Agency business.

#### II. Policy

Employees assigned an agency-owned vehicle must keep their driving record clear of accidents, excessive points and/or convictions for moving traffic violations to receive proper clearance by the Florida Department of Highway Safety and Motor Vehicles.

The assigned employee is the only person permitted to use the agency's vehicle while the vehicle is in his/her possession. No other person (including members of the employee's household), is permitted to drive the assigned vehicle. The exception is employees who are assigned vehicles for business and personal use and have possession of the vehicle at all times.

#### III. Procedure

##### A. Approval

Employees whose duties include driving an assigned agency vehicle are approval by the Chief Executive Officer and on the recommendation of the Department Director, when applicable.

1. The Department Director must ensure that the employee has a valid driver's license of the type required to operate the vehicle assigned and a copy is placed in the Human Resources file.
2. Employee must provide Human Resources a copy of updated driver's license and insurance card annually.

##### B. Notification of Moving Violations/Accident

An employee must notify his/her immediate supervisor within 24 hours of any:

1. Citation or conviction for a moving traffic violation;
2. Motor vehicle accident in which he/she is involved; and/or
3. Suspension or revocation of a driver's license.

Failure to report can result in disciplinary action, up to and including termination or revocation of driving privileges for designated drivers to travel on agency business.

### **C. Motor Vehicle Driving Records**

Employees must submit their (3 year) motor vehicle driving records to the Human Resources Director, at the time of hire and annually thereafter.

1. The Human Resources Director will monitor the driving records of employees annually or as identified by the insurance carrier.
2. Employee driver license identifications are sent annually to the insurance carrier by request. Motor vehicle records are obtained annually from the State Division of Motor Vehicles by the Agency's automobile liability insurance carrier in order to determine who is eligible to drive on agency business.
3. Employees cited with violations are notified by the Human Resources Director. The employee must respond within a set period with pertinent information to verify charge.
4. When a newly hired employee or a promoted/transferred employee is assigned an agency-owned vehicle, it is the responsibility of the Department Director to ensure that the employee has a valid driver's license of the type required to operate the vehicle in question and must provide a copy of driver's license to Human Resources for the employee file.
5. Applicants will be asked, as part of the employment application, to list all convictions for moving violations of traffic laws during the 3 year period immediately preceding the date on which the application for employment is submitted.
6. No assignments will be made to employees or applicants for employment, who have three or more convictions for moving violations, suspended driver's license, and/or cited for driving under the influence (DUI) or driving while intoxicated (DWI) within a 3 year period.

### **D. Penalties for Excessive Traffic Violations**

In the event of convictions resulting from aggravated or serious violations of traffic laws, the agency reserves the right to take disciplinary action against any employee whose duties include driving an assigned agency vehicle.

1. Any employee who has three or more convictions for moving violations, excessive points, suspended driver's license, or is cited for driving under the influence (DUI) or driving while intoxicated (DWI) within a 3 year period, will, upon review, be subject to a suspension of travel reimbursement privileges, the employee's right to drive the agency-owned vehicle, or any other vehicle, in the course of agency business. The term "Convictions," as used herein, includes those incurred while driving any vehicle, agency-owned or otherwise.



2. Failure to report an accident can result in disciplinary action, up to an including Termination or revocation of driving privileges for designated drivers to travel on agency business.
3. Any employee who becomes ineligible to drive based on moving violations or accidents shall be re-evaluated for his/her ability to perform his/her current position.

**E. Conviction**

“Conviction” for any traffic offense in this policy means any adjudication of guilt and not an arrest or a withheld of adjudication.

**F. Personal Use Mileage Rate**

When driving an agency vehicle for personal use, the employee will be charged a mileage rate, which will include cost of normal maintenance, insurance and gasoline.  
Note: Consult the Agency’s Fiscal Management Policies and Procedures and the Business Travel and Reimbursement Policy and Procedure manuals for more details.

**G. Accident Insurance Coverage**

Insurance coverage is provided by the agency for agency-owned vehicles. Accidents are to be reported directly to the insurance company, or contact Human Resources.

**H. Exclusion from Coverage**

Any employee driver excluded from coverage by ALPI’s insurer due to their driving record shall not be allowed to drive any vehicle in the performance of their assigned business responsibilities.

## DRIVING PERSONAL VEHICLES ON AGENCY BUSINESS

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### 150 DRIVING PERSONAL VEHICLES ON AGENCY BUSINESS

#### I. Purpose

Employees and other designated drivers may be required to use their personal vehicles in the performance of their assigned business responsibilities.

#### II. Policy

Employees and other designated drivers must keep their driving record clear of accidents, excessive points or convictions for moving traffic violations to receive proper clearance by the Florida Department of Highway Safety and Motor Vehicles. Employee and other designated drivers must also have State required minimum auto coverage.

When on Agency business, the employee and other designated drivers must be authorized by the appropriate supervisor and must have on file in the Human Resources Department, a signed Driving Personal Vehicles on Agency Business Compliance Certification Form in order to be reimbursed for travel in accordance with applicable funding restraints as defined in the Agency's Fiscal Policies and Procedures Manual and the Business Travel Expense and Reimbursement Policy and Procedure Manual.

ALPI employees and other designated drivers within the Child Development or Head Start Programs, under no circumstances, are required to use their personal vehicle to transport children as a regular means of transportation. In those instances, where transporting children is necessary and authorized by the appropriate department director, the employee and other designated drivers involved will be reimbursed at the then current mileage rate as approved by the Board of Directors and/or the applicable funding source.

#### III. Procedure

##### A. Driver's License

Employees and other designated drivers whose duties include driving personal vehicle for business purposes must submit a copy of their driver's license upon hire and annually thereafter to Human Resources Department.

##### B. Notification of Moving Violations/Accident

An employee and other designated drivers must notify his/her immediate supervisor within 24 hours of any:

1. Citation or conviction for a moving traffic violation;
2. Motor vehicle accident in which he/she is involved; and/or
3. Suspension or revocation of a driver's license.

Failure to report can result in disciplinary action, up to and including termination for employees or revocation of driving privileges for designated drivers to travel on agency business.

### **C. Motor Vehicle Driving Records**

To be eligible to drive a personal vehicle for agency business, employees and/or designated driver must submit their (3 year) motor vehicle driving records to the Human Resources Director, at the time of hire and annually thereafter.

1. The Human Resources Director will monitor the driving records of employees and/or designated driver identified as drivers who request reimbursement for travel
2. Employees and other designated drivers cited with violations will be notified by the Human Resources Director. The employee and other designated drivers must respond within a set time period with pertinent information to verify charge(s) and current status.
3. Applicants will be asked, as part of the employment application process, to list all convictions for moving violations of traffic laws during the 3-year period, immediately preceding the date on which the application for employment is submitted.

### **D. Penalties for Excessive Traffic Violations**

In the event of convictions resulting from aggravated or serious violations of traffic laws, the agency reserves the right to take disciplinary action against any employee and/or designated driver whose duties include driving an assigned agency vehicle.

1. Any employee and other designated drivers who has three or more convictions for moving violations, excessive points, suspended driver's license, or is cited for driving under the influence (DUI) or driving while intoxicated (DWI) within a 3-year period, will, upon review, be subject to a suspension of travel reimbursement privileges, the employee's and other designated drivers right to drive the agency-owned vehicle, or any other vehicle, in the course of agency business. The term "Convictions," as used herein, includes those incurred while driving any vehicle, agency-owned or otherwise.
2. Failure to report an accident can result in disciplinary action, up to and including termination or revocation of driving privileges for designated drivers to travel on agency business.
3. Any employee and other designated drivers who becomes ineligible to drive based on moving violations or accidents shall be re-evaluated for his/her ability to perform his/her current position.

### **E. Conviction**

"Conviction" for any traffic offense in this policy means any adjudication of guilt and not an arrest or a withheld of adjudication.

### **F. Accident Insurance Coverage**

Personal Insurance coverage is to cover any accidents that occur during the course of driving a personal vehicle. Employees and other designated drivers must submit a copy of current insurance card to the Human Resources Director and provide updates annually thereafter.



THE AGRICULTURAL & LABOR PROGRAM, INC.  
POLICIES AND PROCEDURES MANUAL

POLICY NO: 150  
EFF DATE: 10-24-87  
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REVISION: 07-01-2020

**G. Exclusion from Coverage**

Employee and other designated drivers must have the State of Florida required minimum auto coverage to be allowed to drive any vehicle in the performance of their assigned business responsibilities.

Note: Consult the Agency's Fiscal Management Policies and Procedures and the Business Travel and Reimbursement Policy and Procedure manuals for more details.



## HOLIDAY SCHEDULE

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### 560 HOLIDAY SCHEDULE

#### Purpose

Employees are granted twelve holidays in celebration of various occasions throughout the year.

#### II Policy

Twelve holidays are recognized annually in addition to employee leave time.

If one of the holidays occurs on a Saturday, the preceding Friday shall be observed as the holiday. If the holiday falls on a Sunday, the following Monday will be observed as the holiday.

#### III Procedure

At the beginning of each calendar year, the holiday schedule will be identified by the Human Resources Director.

##### A. Holidays

New Year's Day	January 1
Martin Luther King's Birthday	January 15 or day Observed
Presidents' Day	3 <sup>rd</sup> Monday in February
Good Friday	Friday before Easter
Memorial Day	Last Monday in May
Juneteenth	June 19 <sup>th</sup>
Independence Day	July 4 and 5
Labor Day	1 <sup>st</sup> Monday in September
Thanksgiving	Thursday & Friday in November
Veterans' Day	November 11
Christmas	Day Before-Day Of-Day After
Personal Holiday	Floating Holiday

##### B. Leave Eligibility

All regular full-time employees are eligible for holiday time. Eligible employees are regular full-time and regular part-time with at least 20 or more hours of work per week. Probationary employees are eligible for holiday time off 30 days after employment.



## HOLIDAY SCHEDULE

### HOLIDAY SCHEDULE

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A Personal Holiday (Floating Holiday) is granted each calendar year to employees on staff on or before the first working day in January.

#### **C. Holiday Pay**

All regular full-time employees are eligible for holiday pay.

1. Probationary employees are eligible for holiday pay 30 days after employment.
2. Eligible employees shall receive their assigned rate of pay for holiday pay for all regularly scheduled hours not to exceed eight (8) hours per day, but may be less if the normal work schedule is less than the regular eight (8) hours per day work schedule.
3. Employees must work the day before and after a holiday or be on approved leave in order to receive pay for holidays. Approved leave is time off signed or authorized by the supervisor for annual leave, illness, injury, bereavement, jury, military, or personal leave of absence.
4. If a holiday falls in a period of approved absence for which an employee is being paid by the Agency for sick leave, the employee shall be paid holiday pay for the recognized holiday and the hours represented by this pay shall not be charged against the employee's sick leave schedule.

#### **D. Leave During Scheduled Holidays**

If a regular scheduled holiday, indicated on the official holiday schedule, falls during an employee's scheduled annual leave period, equivalent annual leave will be granted.

1. If an employee is scheduled to work on an official holiday, the employee will receive time off for hours worked or earn another day in lieu of the holiday. This time-off should be taken no later than 30 days following the holiday.

## FAMILY MEDICAL LEAVE OF ABSENCE

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### 520 FAMILY MEDICAL LEAVE OF ABSENCE

#### I. Purpose

This is the policy that governs all leaves of absence at The Agency. All leaves of absence must be specifically approved by the Chief Executive Officer. You may request a leave by contacting the Human Resources Department at 1-800-330-3491

#### A. Eligibility

The Agency provides leaves of absence to employees who are eligible for leave under the Family and Medical Leave Act of 1993 (FMLA). You are eligible for family medical leave if:

1. You have worked for The Agency for at least a total of one year without a break in service lasting more than seven years (may be longer if the break is due to military obligations); and
2. You have worked at least 1,250 hours within the past 12 months; and
3. You are employed at a location where 50 or more employees are employed within a 75-mile radius; and
4. You have not exhausted your FMLA entitlement within the applicable period; and
5. Your leave is for the purpose of a FMLA qualifying event.

#### B. Qualification For Up To 12 Weeks of Leave

Eligible employees are allowed to take up to a total of 12 work weeks of family medical leave during a 12-month period for the following reasons:

1. The birth of a child and to care for that child after birth;
2. The placement of a child for adoption or foster care and to care for the newly placed child;
3. Your own serious health condition, including incapacity due to pregnancy or prenatal medical care, that makes you unable to perform one or more essential functions of your job;
4. To provide care for a spouse, child, or parent (but not father-in-law or mother-in-law) with a serious health condition;
5. "Qualifying exigencies" related to, or affected by a family member's call to "covered active duty" (see definitions below);

The Agency will determine the amount of leave available for an eligible employee by using the calendar year method (January 1 through December 31) If your spouse works for The Agency and both spouses request leave for the birth of a child, foster care, adoption, or the serious health condition of their own parents during the same rolling year, both spouses are entitled to a combined total of 12 weeks of leave in any rolling 12-week period.

## **FAMILY MEDICAL LEAVE OF ABSENCE**

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### **C. How to Request Leave**

#### **Follow these steps to request leave:**

1. Contact Human Resources once you are aware of your need for leave, including intermittent leave, you must contact Human Resources at the Corporate Office and inform them of your need for leave, the date you expect leave to begin, and you must request a FMLA packet. This contact must be made at least 30 days before your leave date, or as soon as is practicable under the circumstances.
2. Inform Supervisors: Inform your immediate supervisor that you will be requesting a leave under this policy. You are not required to advise them of any specific medical condition resulting in the need for leave, but under certain circumstances, the Agency may request such information if it will aid in the Agency's compliance with its obligations under this policy or the law.
3. Call-In Requirements: For any absences that qualify, or may qualify for FMLA leave, you are required to comply with the Agency's normal call-in policies and procedures for absences. Failure to follow these policies may result in disciplinary action, and possibly termination. If you are on non-intermittent FMLA leave for a sustained period of time, the Agency may excuse you from the required call-in procedures.
4. Documentation: Upon receipt of notice of the need for possible FMLA leave, the Agency will provide you with the following documents within 5 business days:
  - a. Request for Leave of Absence form for you to complete;
  - b. Eligibility Notice advising whether you are eligible for FMLA benefits (this is not the same as a Designation Notice which advises whether a leave qualifies as FMLA – see below);
  - c. Notice of Rights and Responsibilities (also posted on Agency bulletin boards and attached to this policy);
  - d. Certification form to be completed by Health Care Provider for serious health condition and Medical Caregiver leaves.

## **FAMILY MEDICAL LEAVE OF ABSENCE**

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If you require leave for the serious health condition of you or a family member (including Military Caregiver leave - see provisions below), you must deliver to (designated person/position/department) a medical certification within 15 calendar days of the leave request, unless it is not practicable under the particular circumstances to do so despite your diligent good faith efforts. In such cases, you are required to notify (designated person/position/department) of the issue preventing timely submission as soon as you are aware of the problem. Recertification may also be required. If you fail to provide timely certification, your leave request may be delayed or denied and the Agency's normal policies regarding absenteeism may be applied resulting in potential disciplinary action. (Designated person/position/department) will provide you with the appropriate Medical Certification or Recertification form upon notification of the need for leave.

Within 5 business days of (designated person/position/department) receiving sufficient information regarding the leave, such as the completed Certification, it will provide you with the following:

1. Designation Notice advising as to whether leave is FMLA qualifying;
2. For leave for your serious health condition, a Fitness-For-Duty Certification and a job description identifying the essential functions of your job, both of which must be provided to your health care provider for completion and delivery to the Agency before you may return to work.

If you are taking intermittent leave for your own serious health condition, the Agency may also require your medical provider to complete a Request for Medical Information form in order to determine your ability to perform the essential functions of your position, with or without reasonable accommodation, while you are present at work. If you do not receive all of these forms described in this policy, please contact (designated person/position/department) as soon as possible to receive them.

If you require Qualifying Exigency Leave, you will be required to provide a copy of the covered military member's covered active duty orders or other appropriate documentation issued by the military.

## **FAMILY MEDICAL LEAVE OF ABSENCE**

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### **D. Returning From Leave**

If you take leave due to your own serious health condition, you will be required to provide a Fitness-For-Duty Certification fully completed by your health care provider before your return, stating that you are able to resume the essential functions of your job based upon your job description provided to you with your Fitness-For-Duty form and your Designation. You will not be permitted to return to work until the fully completed Fitness for Duty form is provided to the Agency.

Upon return from Family Medical Leave, you will be returned to the same or an equivalent position with the same pay and benefits with the following exceptions:

1. Reinstatement may be denied to a key employee if denial is necessary to prevent substantial and grievous economic injury to the Agency's operations. For the purpose of this policy, a "key employee" is defined as a salaried employee eligible for leave under this policy whose pay is among the top 10% of all Agency employees.
2. If you knowingly provide false information regarding your leave, or are found to have otherwise violated the Agency's policies, where such violation would be a terminable offense, even if such offense is discovered during the course of your leave.
3. If your position has been eliminated due to a reorganization or reduction- in-force.
4. Failure to return to work at the end of your approved leave absent extenuating circumstances.

### **E. Military Caregiver Leave – Qualification For Up To 26 Weeks of Leave**

Family Medical Leave is also available for an employee to care for a "covered service member" who is the employee's spouse, son or daughter, parent or next of kin, and who has a "serious injury or illness" incurred or aggravated in the line of duty while on active duty (see definitions below). "Next of kin" is defined as the closest blood relative to the injured or recovering service member. This type of leave, called "Military Caregiver" or "Covered Service Member Leave," may extend up to 26 weeks in a single 12-month period.

## **FAMILY MEDICAL LEAVE OF ABSENCE**

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For this type of leave, the single 12-month period will begin on the first day the eligible employee takes leave to care for the covered service member and ends 12 months after that date. Any unused portion of the 26 weeks will be forfeited at the end of the 12-month period. The leave entitlement is available one time per-covered-service member and per-injury. Furthermore, an eligible employee is only entitled to a combined total of 26 workweeks of leave for any family medical leave qualifying reason during the single 12-month period, and no more than 12 weeks of leave may be used for leave which would normally be entitled to a maximum of 12 weeks in a 12-month period.

If your spouse also works for the Agency and you both become eligible for FMLA leave, the two of you together will be limited to a combined total of 26 weeks in a single 12-month period and 12 work weeks of leave in any 12-month period for Military Caregiver Leave. In both instances, previous family medical leave taken in the calendar year will also count towards the total amount of leave available.

Unless otherwise specified, all procedures and terms applicable to 12 weeks of FMLA leave above also apply to Military Caregiver Leave.

### **F. Additional Non-FMLA Leave**

When sufficient personal reasons require, an employee, at the Agency's discretion, may be granted a non-FMLA or extended leave of absence without pay. A leave of absence will be granted for an initial period of up to 60 days, and employees may request extensions of up to 30 days which are granted at the Agency's discretion. Generally, total leave will not be extended beyond [one year/180 days] from the beginning date of the leave absent extenuating circumstances.

Because operations sometimes require that vacant positions be filled, a personal leave of absence does not guarantee that the job will be available when an employee returns from a leave. An effort, however, will be made to place an employee in his or her previous position or a comparable job for which the employee is qualified to perform upon return from leave. During a leave, employees are also invited to apply for a permanent transfer to an open position for which they are qualified which may better accommodate any long-term medical restrictions at any time during their leave. If an employee on leave, or returning from leave, makes such application, they must notify the Human Resources Director so that appropriate consideration may be given to the transfer request.



## **FAMILY MEDICAL LEAVE OF ABSENCE**

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If an employee is unable to return to the employee's position at the end of leave and a transfer is not available or sought by the employee, then the employee may be eligible for rehire if the employee's prior work history warrants rehire.

### **G. TERMS FOR ALL LEAVES UNDER THIS POLICY**

**Pay and Benefits:** Family medical leave and personal leaves of absence are unpaid. Employees will be required to use accrued paid leave hours concurrent with any FMLA leave. While on a leave of absence, employees will not accrue any paid leave. For FMLA leave, an employee's health plan benefits will continue for the duration of the leave, provided the employee continues to pay the employee's portion of all premium payments during leave. For non-FMLA personal leave, the Agency may continue to make its regular payment to continue to cover the employee under its group health plan through the end of the month [in/after] which the employee requests leave. Thereafter, employees on leave may continue their benefits under the Agency's group health insurance plan provided the employee pays the entire monthly premiums due during the leave. The Benefits Department will advise you of arrangements for the payment of your premiums, but generally, you must make payments directly to **The Agricultural and Labor Program, Inc., Attn: Human Resources** by the 30th day of the month of coverage. The Agency may deduct any unpaid premiums from an employee's pay or accrued benefits.

**Intermittent Leave:** Intermittent leave or leave on a reduced work schedule will be granted if there is a medical need for such leave, although intermittent leave is not normally granted for becoming a parent. You must make reasonable efforts, including discussions with (designated person/position/department) and your supervisor to schedule intermittent leave for planned medical treatment so as not to unduly disrupt the Agency's operations.

**Other Employment While On Leave:** Unless an employee already has approval to work a second job while employed with the Agency, employees must obtain prior approval from (designated person/position/department) to work at another job (including school practicums) while on an approved Leave of Absence. This requirement is intended to ensure that the work at another position is consistent with the stated need for leave.



## **FAMILY MEDICAL LEAVE OF ABSENCE**

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The Agency specifically reserves all rights available to employers under the provisions of the Family Medical Leave Act of 1993 and the January and October 2009 revisions, even if those rights are not specifically referenced in this policy.

### **H. Definitions**

#### **For purposes of this policy:**

A “serious medical condition” means an illness, injury or impairment or physical or mental condition that involves either an overnight stay in a medical care facility, or continuing treatment by a health care provider for a condition that either prevents you from performing the functions of your job, or prevents the qualified family member from participating in school or other daily activities.

Subject to certain conditions, the continuing treatment requirement may be met by a period of incapacity of more than 3 consecutive calendar days combined with at least two visits to a health care provider or one visit and a regimen of continuing treatment, or incapacity due to pregnancy, or incapacity due to a chronic condition. Other conditions may meet the definition of continuing treatment.

A “serious injury or illness” as it relates to military caregiver leave means:

1. In the case of a member of the Armed Forces (including a member of the National Guard or Reserves), means an injury or illness that was incurred by the member in line of duty on active duty in the Armed Forces (or existed before the beginning of the member’s active duty and was aggravated by service in line of duty on active duty in the Armed Forces) and that may render the member medically unfit to perform the duties of the member’s office, grade, rank, or rating; and
2. in the case of a veteran who was a member of the Armed Forces (including a member of the National Guard or Reserves) at any time during a period described in paragraph (15)(B), means a qualifying (as defined by the Secretary of Labor) injury or illness that was incurred by the member in line of duty on active duty in the Armed Forces (or existed before the beginning of the member’s active duty and was aggravated by service in line of duty on active duty in the Armed Forces) and that manifested itself before or after the member became a veteran.

## **FAMILY MEDICAL LEAVE OF ABSENCE**

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“Covered active duty” means:

1. in the case of a member of a regular component of the Armed Forces, duty during the deployment of the member with the Armed Forces to a foreign country; and
2. In the case of a member of a reserve component of the Armed Forces, duty during the deployment of the member with the Armed Forces to a foreign country under a call or order to active duty under a provision of law referred to in section 101(a) (13) (B) of title 10, United States Code. A “covered service member” is:
  - a. A member of the Armed Forces (including a member of the National Guard or Reserves) who is undergoing medical treatment, recuperation, or therapy, is otherwise in outpatient status, or is otherwise on the temporary disability retired list, for a serious injury or illness; or
  - b. A veteran who is undergoing medical treatment, recuperation, or therapy, for a serious injury or illness and who was a member of the Armed Forces (including a member of the National Guard or Reserves) at any time during the period of 5 years preceding the date on which the veteran undergoes that medical treatment, recuperation, or therapy.

A “qualifying exigency” is leave for employees who is the spouse, son, daughter or parent of a member of the regular Armed Services, the National Guard, or the Reserves, or retired military or the Reserves, who is on “covered active duty,” or who has been notified of an impending call or order to covered active duty.

The “qualifying exigency” covers needed leave for any of the following issues related to a family member’s covered active duty or call to covered active duty:

1. Short-notice deployment occurring seven or less days after notice
2. Military events and activities
3. Child care and school activities
4. Financial and legal arrangements
5. Counseling
6. Rest and recuperation (maximum of 5 days for each instance)
7. Post-deployment activities



## **FAMILY MEDICAL LEAVE OF ABSENCE**

8. Additional activities that arise out of covered active duty, provided that the Agency and you agree, including agreement on timing and duration of the leave.

An employee is eligible for exigency leave as soon as the employee's family member receives the deployment or call-up notice.

A "son or daughter," for purposes of both Military Caregiver and Qualified Exigency leave related to a "son or daughter," the son or daughter does not have to be a minor.

For further information concerning your rights and responsibilities under the Family Medical Leave Act, please refer to the postings on the Agency's bulletin boards, the Notice of Rights and Responsibilities attached to (this policy/ this handbook), or contact the Human Resources Department.

### **I. FMLA Leave Expansion and Emergency Paid Sick Leave Policy (Coronavirus)**

#### **For purpose of this policy**

To comply with the Families First Coronavirus Response Act and to assist employees affected by the COVID-19 outbreak with job-protected leave and emergency paid sick leave. This policy will be in effect from April 2, 2020, until December 31, 2020. Our existing FMLA leave policy 520 still applies to all other reasons of or leave outside of this policy.

### **I. Expanded FMLA Leave**

#### **Employee Eligibility**

All employees who have been employed with The ALPI for at least 30 days.

#### **Reason for Leave**

Eligible employees who are unable to work (or telework) due to a need to care for their child when the school or place of care has been closed, or the regular childcare provider is unavailable due to a public health emergency with respect to COVID-19.

"Child" means a biological, adopted, or foster child, a stepchild, a legal ward, or a child of a person standing in loco parentis, who is-

1. under 18 years of age; or
2. 18 years of age or older and incapable of self-care because of a mental or physical disability.

"Childcare provider" means a provider who receives compensation for providing childcare services on a regular basis, including:

1. a center-based childcare provider
1. a group home childcare provider

## **FAMILY MEDICAL LEAVE OF ABSENCE**

2. a family childcare provider (one individual who provides childcare services for fewer than 24 hours per day, as the sole caregiver, and in a private residence)
3. other licensed provider of childcare services for compensation
4. a childcare provider that is 18 years of age or older who provides childcare services to children who are either the grandchild, great grandchild, sibling (if such provider lives in a separate residence), niece, or nephew of such provider, at the direction of the parent.

“School” means an elementary or secondary school.

### **Duration of Leave**

Employees will have up to 12 weeks of leave to use from April 2, 2020, through December 31, 2020, for the purposes stated above. This time is included in and not in addition to the total FMLA leave entitlement of 12 weeks in a 12-month period.

For example, if an employee has already taken 6 weeks of FMLA leave, that employee would be eligible for another 6 weeks of FMLA leave under this policy.

### **Pay During Leave**

Leave will be unpaid for the first 10 days of leave; however, employees may use any accrued paid vacation, sick or personal leave during this time. The employee may also elect to use the paid leave provided under the Emergency Paid Sick Leave Act, as further explained below. After the first 10 days, leave will be paid at two-thirds of an employee's regular rate of pay for the number of hours the employee would otherwise be scheduled to work. Pay will not exceed \$200 per day, and \$10,000 in total. Any unused portion of this pay will not carry over to the next year.

For employees with varying hours, one of two methods for computing the number of hours paid will be used:

- The average number of hours that the employee was scheduled per day over the 6-month period ending on the date on which the employee takes leave, including hours for which the employee took leave of any type. Or,
- If the employee has worked less than 6 months, the expected number of hours to be scheduled per day at the time of hire.

### **Employee Status and Benefits During Leave**

While an employee is on leave, the company will continue the employee's health benefits during the leave period at the same level and under the same conditions as if the employee had continued to work. While on paid leave, the employer will continue to make payroll deductions to collect the employee's share of the premium. During any unpaid portions of leave, the employee must continue to make this payment per instructions from the HR department.



## **FAMILY MEDICAL LEAVE OF ABSENCE**

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If the employee contributes to a life insurance or disability plan, the employer will continue making payroll deductions while the employee is on paid leave. During any portion of unpaid leave, the employee may request continuation of such benefits and pay his or her portion of the premiums, or the employer may elect to maintain such benefits during the leave and pay the employee's share of the premium payments. If the employee does not continue these payments, the employer may discontinue coverage during the leave. If the employer maintains coverage, the employer may recover the costs incurred for paying the employee's share of any premiums, whether or not the employee returns to work.

### **Procedure for Requesting Leave**

All employees requesting FMLA leave must provide written notice, where possible, of the need for leave to the HR Director as soon as practicable utilizing the FFCRA Request Form. Verbal notice will otherwise be accepted until written notice can be provided. Within five business days after the employee has provided this notice, the HR manager will complete and provide the employee with any Department of Labor (DOL) required notices.

The notice the employee provides should include a brief statement as to the reason for leave, and if possible, the expected duration.

On a basis that does not discriminate against employees on FMLA leave, the company may require an employee on FMLA leave to report periodically on the employee's status and intent to return to work.

### **Employee Status After Leave**

Generally, an employee who takes FMLA leave will be able to return to the same position or a position with equivalent status, pay, benefits and other employment terms. The company may choose to exempt certain key employees from this requirement and not return them to the same or similar position when doing so will cause substantial and grievous economic injury to business operations. Key employees will be given written notice at the time FMLA leave is requested of his or her status as a key employee.

Generally, an employee who takes FMLA leave will be able to return to the same position or a position with equivalent status, pay, benefits and other employment terms. If the position the employee held before leave started no longer exists due to economic conditions or operational changes that are made because of the public health emergency, and no equivalent position is available, the employee will not be returned to employment. However, for the period of one year after qualifying leave under this policy ends, The ALPI will make reasonable efforts to contact the employee if an equivalent position becomes available.

## **FAMILY MEDICAL LEAVE OF ABSENCE**

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Please contact the HR department with any questions.

### **II. Emergency Paid Sick Leave**

#### **Eligibility**

All full- and part-time employees unable to work (or telework) due to one of the following reasons for leave:

1. The employee is subject to a federal, state or local quarantine or isolation order related to COVID-19.
2. The employee has been advised by a health care provider to self-quarantine due to concerns related to COVID-19.
3. The employee is experiencing symptoms of COVID-19 and seeking a medical diagnosis.
4. The employee is caring for an individual who is subject to either number 1 or 2 above.
5. The employee is caring for his or her child if the school or place of care of the child has been closed, or the childcare provider of such child is unavailable, due to COVID-19 precautions.
6. The employee is experiencing any other substantially similar condition specified by the secretary of health and human services in consultation with the secretary of the treasury and the secretary of labor.

“Child” means a biological, adopted, or foster child, a stepchild, a legal ward, or a child of a person standing in loco parentis, who is-

- (A) under 18 years of age; or
- (B) 18 years of age or older and incapable of self-care because of a mental or physical disability.

[Note: A definition for “individual” should be provided as soon as more guidance is available.]

#### **Amount of Paid Sick Leave**

All eligible full-time employees will have up to 80 hours of paid sick leave available to use for the qualifying reasons above. Eligible part-time employees are entitled to the number of hours worked, on average, over a two-week period.

For employees with varying hours, one of two methods for computing the number of hours paid will be used:

- The average number of hours that the employee was scheduled per day over the 6-month period ending on the date on which the employee takes leave, including hours for which the employee took leave of any type. Or,



## **FAMILY MEDICAL LEAVE OF ABSENCE**

- If the employee has worked less than 6 months, the expected number of hours to be scheduled per day at the time of hire.

### **Rate of Pay**

Paid emergency sick leave will be paid at the employee's regular rate of pay, or minimum wage, whichever is greater, for leave taken for reasons 1-3 above. Employees taking leave for reasons 4-6 will be compensated at two-thirds their regular rate of pay, or minimum wage, whichever is greater. Pay will not exceed:

- \$511 per day and \$5,110 in total for leave taken for reasons 1-3 above;
- \$200 per day and \$2,000 in total for leave taken for reasons 4-6 above.

### **Interaction with Other Paid Leave**

The employee may use emergency paid sick leave under this policy before using any other accrued paid time off for the qualifying reasons stated above.

Employees on expanded FMLA leave under this policy may use emergency paid sick leave during the first 10 days of normally unpaid FMLA leave.

### **Procedure for Requesting Emergency Paid Sick Leave**

Employees must notify their manager or the HR manager of the need and specific reason for leave under this policy. A form will be provided to all employees on the company intranet and/or in a manner accessible to all. Verbal notification will be accepted until practicable to provide written notice.

Once emergency paid sick leave has begun, the employee and his or her manager must determine reasonable procedures for the employee to report periodically on the employee's status and intent to continue to receive paid sick time.

### **Carryover**

Paid emergency sick leave under this policy will not be provided beyond December 31, 2020. Any unused paid sick leave will not carry over to the next year or be paid out to employees.

### **Job Protections**

No employee who appropriately utilizes emergency paid sick leave under this policy will be discharged, disciplined or discriminated against for work time missed due to this leave.

Please contact the HR department with any questions.



## DRIVING PERSONAL VEHICLES ON AGENCY BUSINESS COMPLIANCE CERTIFICATION FORM

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I \_\_\_\_\_ affirm that in order to perform my duties as \_\_\_\_\_ I may be required to drive a personal vehicle on agency business.

I hereby affirm that I have provided the Agency's Human Resources Department, a copy of my valid driver's license, current auto insurance card, and current three (3) year DMV driving record. I further understand that my driver's record **must** be clear of moving violations and accidents in order to be in compliance with Agency Policy #150 (Driving Personal Vehicles on Agency Business).

I understand that should I be found out of compliance with the Agency's Policy #150, I will not be eligible to drive a personal vehicle to perform any agency business. I further understand that my failure to comply could be cause for denial of approval to drive a personal or any vehicle to conduct agency business.

Furthermore, I hereby agree that **I WILL NOT HOLD THE AGRICULTURAL AND LABOR PROGRAM, INC. LIABLE FOR ANY ACCIDENTS, INJURIES, OR LOSSES** should I be found out of compliance with the Agency's Policy #150.

My signature acknowledges my understanding and acceptance of the terms of which applies.

\_\_\_\_\_  
Employee/Other Designated Driver

\_\_\_\_\_  
Date

***Confirmation of Receipt/Acceptance By:***

\_\_\_\_\_  
Human Resources Director

\_\_\_\_\_  
Date



## DRIVING AGENCY VEHICLES ON AGENCY BUSINESS COMPLIANCE CERTIFICATION FORM

I \_\_\_\_\_ affirm that I have been assigned an Agency-owned vehicle to perform my duties as \_\_\_\_\_.

Furthermore, I understand that I am the **only** person permitted to use the Agency's owned vehicle while the vehicle is in my possession. No other person (including members of my household) is permitted to drive the assigned vehicle.

I hereby affirm that I have provided the Agency's Human Resources Department, a copy of my valid driver's license, current auto insurance card, and current three (3) year DMV driving record (3 years). I further understand that my driver's record **must** be clear of moving violations and accidents in order to be in compliance with Agency Policy #145 (Driving Agency Vehicles on Agency Business). A copy of Policy was provided to me with the issuance of the vehicle.

I understand that should I be found out of compliance with the Agency's Policy #145, I will not be eligible to drive the agency vehicle. I further understand that my failure to comply could be cause for the termination of my privilege to drive any agency vehicle.

Furthermore, I hereby agree that **I WILL NOT HOLD THE AGRICULTURAL AND LABOR PROGRAM, INC. LIABLE FOR ANY ACCIDENTS, INJURIES, OR LOSSES** should I be found out of compliance with the Agency's Policy #145.

My signature acknowledges my understanding and acceptance of the terms of which applies.

\_\_\_\_\_  
Employee/Other Designated Driver

\_\_\_\_\_  
Date

**Confirmation of Receipt/Acceptance By:**

\_\_\_\_\_  
Human Resources Director

\_\_\_\_\_  
Date

11/24/2013

# FISCAL POLICIES AND PROCEDURES (TOC)

Rev. 2013

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THE AGRICULTURAL AND LABOR PROGRAM, INC  
FISCAL MANAGEMENT POLICIES AND PROCEDURES MANUAL

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CODE OF CONDUCT

A. ACCEPTANCE OF GIFTS AND GRATUITIES

Policy:

Employees of ALPI, or members of employees' immediate family, ALPI Officers and Members of any Board or policy-making body, are prohibited from soliciting or accepting gratuities, favors, or anything of monetary value from:

- a. persons receiving benefits or services under any program financially assisted by Federal, state, or local funds;
- b. any person or anyone performing services under a contract with ALPI;
- c. persons in a position to benefit from the action of any employee or board member.

Purpose:

ALPI will maintain a code or standard of conduct which shall govern the performance of its officers, employees, and agents, in connection with expending grant funds.

Procedures:

To the extent permissible under the State or local law, rules and regulations, or if ALPI determines that it has the legal and practical capacity for enforcement, such standards as stated in the Personnel Policies shall provide for appropriate penalties, sanctions, or other disciplinary actions to be applied for violation of such standards either by ALPI's officers, employees, or agents, or by its contractors or their agents.

CODE OF CONDUCT

**B. RESPONSIBILITY FOR CLIENT FINANCES**

Policy:

ALPI staff shall not assume any responsibility for client finances. Those clients who are unable to manage their finances and have no family available to assist them will be referred to the local department of Social Services.

- a. ALPI staff may not cash any benefit checks for clients, nor will they do bill-paying or banking for confused or incompetent clients.
- b. ALPI staff shall not assume legal guardianship nor will they act as Representative Payee for any client, nor act as an attorney-in-fact for any client with or without a written power of attorney.

Purpose:

To protect personal finances of clientele served by ALPI.

Procedures:

- a. In the event a client requires assistance with shopping and bill-paying and is physically unable to go to the store himself/herself, that client will give the staff person the approximate amount of money required for the purchase. The staff person will do the shopping/bill-paying and return to the client the change and the receipt of purchase. Employees may not use a client's blank check for any purpose.
- b. If a staff member is related to a client, the staff member may act in a representative capacity only with written approval of the Chief Executive Officer.

# PURCHASING AND PROCUREMENT

## A. GENERAL

This section explains the request for and purchase of supplies and equipment. Department/Program Directors or designate will identify specific procedures for their unit to follow in accordance with established procedures.

The interests of ALPI must always be kept in mind during the procurement process. The most must be obtained for the least. Documentation for the purchase of goods or services and the receipt of them should flow in the same direction simultaneously. And, receipt of what actually happened must be in writing.

The purchasing of goods and services including but not limited to Sub-Recipient Services is initiated by the utilization of either of two procedures depending upon the amount to be spent. These two procedures (systems): Purchase Requisition (Less than \$100.00) and Purchase Order (\$100.00 or more).

## B. PURCHASE REQUISITION PROCEDURES

### 1. Definition

A **Purchase Requisition** (or request for purchase) is a form written by designated personnel to ask administration to buy goods or services whose unit or extended cost is less than \$100.00. The form may be written independently for each request with two (2) copies provided one original and one copy for Budget and Finance and one copy for the person who writes the request.

### 2. Documentation

The Purchase Requisition should be signed by the person preparing it and should include the following:

- Information as to the quantity and nature of goods or services
- Suggested sources of supply
- Estimated unit cost and extension based on:
  - (a) professional knowledge
  - (b) catalogues
  - (c) other reliable sources
- Date delivery is needed
- Justification for approval or disapproval of the requisition (approved budget item and funds availability).

3. Approval

Approval of the **Purchase Requisition Form** should be done by Department/Program Director and approved by the Chief Executive Officer before ordering. Approved Purchase Requisitions less than a \$100.00 are forwarded to the Budget and Finance Department for payment attached to a **Check Request Form** with a copy of the vendor's invoice attached. The vendor's invoice serves as verification of receipt of goods or services.

Invoice computations and account distributions should be verified. Discounts, rebates, and other allowances are deducted from the vendor's invoice before submission for payment. The original invoice and delivery ticket (if applicable) should be submitted for payment or to support payment vouchers. The copy of the Purchase Requisition should be completed, including verification of the "items received" columns, and a signed invoice or a delivery ticket.

Approved Purchased Requisitions must be submitted to Budget and Finance for the issuance of a **Purchase Order Form** prior to the purchase of any goods or services that is \$100.00 or more.

**C. PURCHASE ORDER PROCEDURES**

1. Definition

A Purchase Order is a document authorizing a vendor to deliver described merchandise, material, or services at a specified price (unit cost or extension which exceeds \$100.00). Upon acceptance by a vendor, a Purchase Order becomes a legally binding contract. The **Purchase Order Form** gives the vendor authority to ship the required goods or perform the required service and binds ALPI for payment.

2. Form

The **Purchase Order Form** is prepared by the requesting project or department showing all information necessary for the vendor to identify the items and quantities, and make delivery to the proper location. It is prepared in four (4) copies for the following use:

Copy	to	Use
White	Vendor	Authorizes the purchase transaction.
Goldenrod	B & F	Is filed sequentially in the permanent purchase order file.
Canary	B & F	Budget and Finance place in an open Purchase Order file. When goods are received, it is attached to the Check Request and is placed in the file for future reference.
Pink	Requisitioner	GMS generated Purchase Order copy and the pink copy are maintained by requisitioner in an appropriate file which verifies that the order has been placed.

The Purchase Order form is pre-numbered and contains the following information:

1. Vendor's name and address.
2. Date of Purchase Order issuance.
3. Delivery destination or location and any special delivery instructions including a delivery deadline date (if applicable), method of shipment, etc.
4. Quantities ordered.
5. Description of items ordered.
6. Unit prices.
7. Amounts (unit prices extended and totaled).
8. Signature of a person in Budget and Finance who issued the Purchase Order Number.
9. Other special instructions.
10. Justification (approved budget item and funds availability).

It is the responsibility of Budget and Finance to account for all Purchase Orders in numerical sequence. At all times the status and disposition of all Purchase Orders should be known. If

a **Purchase Order** is canceled, Budget and Finance should collect all copies of the canceled Purchase Order and maintain them in the Purchase Order file.

### 3. Back-Orders

A back-order occurs when an order is placed with the vendor, and the particular item is not in stock at the moment. The vendor indicates this on the invoice with the intention of filling/completing the order when the back-ordered item(s) becomes available.

The same paper trail exists for back-ordered items except that on the invoice and copies the **Purchase Order Form** forwarded to Budget and Finance. The notation that the item is on back-order is made. Usually, the requisitioner advises Budget and Finance that an item which was ordered has not been received. Budget and Finance then reviews the supporting documentation for this item and selects one of the two following options: (1) recorder the item; or (b) cancel the order. The disposition of the back-order should be noted on the copies of the Purchase Order. All back-orders will be routinely canceled as of the end of the fiscal year.

## D. **PURCHASING SYSTEM**

### Policy:

A central purchasing system is used to make volume purchases of consumable supplies, vehicles, contracts, services, printing, equipment and other items used in the agency's daily operation when applicable. These policies also apply to leasing equipment.

1. A **Purchase Requisition Form** must be used for all purchases whose unit or extended cost is less than \$100.00 and a **Purchase Order Form** must be used for all purchases whose unit or extended cost is \$100.00 or more.
2. A Purchase Order number will not be issued after an order has been placed.
3. Only ALPI approved vendors will be used.
4. Purchases valued at less than \$1,000.00 may be made without obtaining bids; however, in all instances the lowest price will be obtained.
5. Purchases valued at \$1,000.00 or over require three bids/quotes and, in some instances, may require funding source approval.

6. Purchases of \$5,000.00 or more will require a public advertisement for bids and funding source approval when applicable.

Purpose:

To obtain the lowest price through volume purchases and the use of competitive bids and negotiations, to provide a central system for cost control and accountability, to afford equal opportunity for bidders/vendors, and to enable Budget and Finance Department to control and monitor expenditures of funds for each grant.

Procedures:

Purchases Less than \$100:

- (a) Department/Program Director determines whether the planned purchase is an allowable cost in the budget, and whether funds are available.
- (b) Department/Program Director or designate will complete the **Purchase Requisition Form** in its entirety, submitting the appropriate copy and all documentation to the Budget and Finance Department.

2. Purchases of \$100 to \$999:

- (a) Department/Program Director determines whether the planned purchase is an allowable cost in the budget, and whether funds are available.
- (b) The Purchase Order process is followed.

3. Purchases of \$1,000 to \$4,999 - BIDS REQUIRED:

The selection process for bid evaluations will consider the following:

- (1) Cost
  - (2) Quality
  - (3) Past experience and reputation of bidders may be considered when new selection of lowest bid.
  - (4) When making selection of 'a sole source', documentation is required.
- (a) Department/Program Director determines whether the planned purchase is an allowable cost in the budget, and whether funds are available.
  - (b) Department/Program Director makes discreet inquiries to vendors for prices

and information about the purchase to be made, but make no commitment. This enables you to estimate the cost when you obtain the purchase order.

- (c) Department/Program Director complete **Purchase Requisition Form** giving specifics. Program staff will submit form to their Department/Program Director; Department/Program Directors submit to Budget and Finance. Budget and Finance clears request with the Chief Executive Officer.
- (d) Action is taken by the Chief Executive Officer or the Finance Director to approve or deny the request, noting the form accordingly. If approved, **Purchase Requisition Form** is forwarded to Budget and Finance. If funding source approval is required, the Department/Program Director and/or the Budget and Finance Director will assist the Chief Executive Officer to secure approval before signing off.
- (e) Within fifteen (15) working days from receipt of the form, the Department/Program Director with assistance from Budget and Finance will solicit bids, using **Request for Bid/Quotation Form**. The Department/Program Director will assist Budget and Finance in completing the bid form with specifications to be sent to the vendor. A copy of **Request for Bid/Quotation Form** is directed to the Chief Executive Officer for approval.
- (f) Budget and Finance will open and review all bids/quotations with the Chief Executive Officer.
- (g) Once the Chief Executive Officer approves a bid, Budget and Finance is notified of the decision.
- (h) Budget and Finance inform the Department/Program Director of the decision, documenting action taken on Request for Bid/Quotation and notifying all bidders via a **Bid Denial Notice** or a **Bid Acceptance Notice**.

Purchases of \$5,000 and Over - PUBLICLY ADVERTISED BIDS REQUIRED

- (a) Determine from Budget and Finance Department whether the planned purchase is an allowable cost in the budget, and whether funds are available.
- (b) Make discreet inquiries to vendors for prices and information about the purchase to be made, but make no commitment. This enables you to estimate the cost when you obtain the purchase order.

- (c) Complete a **Purchase Requisition Form**, giving specifics. Staff will submit form to their Department/Program Director; Department/Program Directors submit to Budget and Finance. Budget and Finance clears request with the Chief Executive Officer.
- (d) Action is taken by the Chief Executive Officer or the Finance Director to approve or deny the request, noting the form accordingly. If approved, Request for Bid/Quotation is forwarded to Budgeting and Finance. If funding source approval is required, the Finance Director is responsible for obtaining it before signing off.
- (e) Within fifteen (15) working days from receipt of the form, Budget and Finance will solicit bids. Specifications will be prepared on Request for Bid/Quotation and the bids will be advertised in local news publications where appropriate. If request for bid/quotation is to be published, a copy of Request for Bid/Quotation with full specifications is sent to the Secretary of the Chief Executive Officer who arranged for the advertisement and provides a copy of the advertisement to Budget and Finance. A copy of Request for Bid/Quotation is directed to the Department/Program Director. All bids must be directed to the Finance Director.
- (f) Budget and Finance will open and review all bids/quotations with the Chief Executive Officer.
- (g) Once the Chief Executive Officer approves a bid, Budget and Finance is notified of the decision.
- (h) Budget and Finance inform the Department/Program Director of the decision, documenting action taken on **Request for Bid/Quotation Form** and notifying all bidders via a **Bid Denial Notice** or a **Bid Acceptance Notice**.

5. Sole Source Purchases

There are some situations in which "sole source" purchases including but not limited to Sub-Recipient Services and professional services are allowed. In instances where only one place of business sells or provides a particular item or service, or is selling at a price that no other vendor can match, a sole source price may be authorized.

- (a) Follow applicable procedures, Item 2, 3, or 4.

6. Contract Services, Consultants

General Definition:

A contract is defined as a written agreement between at least two parties consisting of promises which are enforceable by law.

Procedures:

The same purchasing procedures will be followed as set forth in Item 2, 3, or 4. The following additional considerations are necessary:

- (a) Consider in-house capabilities to accomplish services before seeking them outside the agency.
- (b) Limit experts' or consultant's fees to the going, acceptable rate per man day.
- (c) Seek accounting or legal services on an "as performed" basis instead of a "retainer" basis.
- (d) Determine with immediate supervisor the exact type of service or contractual agreement you needed prior to making formal request.
- (e) Provisions of contracts include the date of agreement, services to be provided, general provisions and conditions, cost effectiveness, method of payment, authorized signatures and titles, names of parties involved and the corporate seal. The Executive Department has ALPI's approved pro forma Contract for Services and Sub-Recipient Agreement which is to be used. The contract/agreement format will be reviewed for appropriate terms and provisions as needed.
- (f) Budget and Finance is the custodian of original, executed Agreements. Copies will be provided to the office of the Chief Executive Officer and appropriate Department/Program Director offices.
- (g) The Chief Executive Officer obtains formal approval from the Board of Directors for auditing services or other significant contracts.
- (h) It is the responsibility of the Department/Program Director to secure evidence that services were actually performed or that contractual work was satisfactorily completed prior to authorizing payment.

7. Consumable Supplies

Consumable supplies are ordered through the designated support staff person of each program/department. Central office consumable supplies and forms are the responsibility of the Secretary of the Chief Executive Officer.

Procedures:

Submit the appropriate purchase requisition/purchase order form to Budget and Finance (Item 1, 2, 3, 4, or 5 above).

8. Printing

Policy:

The Office of the Chief Executive Officer will order all printed materials such as stationery, envelopes, business cards, agency forms, etc., as well as all materials which are to be copied for outside distribution. Materials to be printed or copied must be cleared with the Office of the Chief Executive Officer prior to initiating purchase. The agency logo will be used whenever possible. The Office of the Chief Executive Officer or designate will maintain the log (with samples) of all forms authorized for utilization by The Agricultural and Labor Program, Inc.

Procedures:

- (a) Prepare draft of materials.
- (b) Submit to the Office of the Chief Executive Officer for technical assistance and approval.
- (c) The Office of the Chief Executive Officer checks for content, accuracy and appearance, determines whether material is in compliance with funding source and agency standards, and, when necessary, obtains approval of the funding source and the Chief Executive Officer.
- (d) Once approvals are received, follow procedures as set forth in Item 1, 2, 3, 4, or 5 above.
- (e) When materials are received by purchaser, copies will be sent to the Office of the Chief Executive Officer for review prior to making payment to the vendor.

9. Emergency Purchases (Services or Repairs)

Policy:

Regular purchasing procedures are required for purchasing services that include, but are not limited to, vehicle maintenance, repairs of equipment, building maintenance and incidentals, except in case of an emergency the following procedures are followed:

- (a) The Department/Program Director involved will telephone the Finance Director and explain what services are needed, giving the estimated cost.

- (b) In the event the Finance Director is not available, and there is a need to proceed immediately with the service, a designate may give approval.
- (c) Once approval is obtained, the emergency service purchase may be made.
- (d) Within three (3) days following receipt of the service, a **Purchase Order Form** must be completed and filed with Budget and Finance indicating 'emergency service' thereon.

#### 10. Signs/Decals

##### Policy:

Signs identifying buildings, offices and vehicles of the agency and its projects will be affixed or erected and maintained in a manner which presents a professional image for ALPI at all sites.

##### Purpose:

To provide immediate identification of buildings, vehicles and offices by residents of the community and for prospective clients of the agency.

##### Procedures:

Department/Program Directors are responsible for enforcing agency policy and will make periodic inspections (at least quarterly) to ensure that appropriate identifying signs, decals, etc., are on agency and project buildings, offices, and vehicles.

#### 11. Vehicles

##### Policy:

The office of the Chief Executive Officer will be responsible for the decision to acquire vehicles for use by ALPI staff for program and/or administrative purposes.

##### Purpose:

To identify and maintain a record of vehicles purchased and/or donated to the organization.

##### Procedures:

- (a) Determine from Budget and Finance Department whether the planned purchase is an allowable cost in the budget, and whether funds are available.
- (b) Make discreet inquiries to vendors for prices and information about the purchase to be made, but make no commitment. This enables you to estimate the cost when you obtain the purchase order.

- (c) Complete **Purchase Requisition Form** giving specifics. Staff will submit form to their Department/Program Director; Department/Program Directors submit to Budget and Finance. Budget and Finance clears request with the Chief Executive Officer.
- (d) Action is taken by the Chief Executive Officer or the Finance Director to approve or deny the request, noting the form accordingly. If approved, **Purchase Requisition Form** is forwarded to Budgeting and Finance. If funding source approval is required, the Finance Director is responsible for obtaining it before signing off.
- (e) Within fifteen (15) working days from receipt of the form, Budget and Finance will solicit bids. Specifications will be prepared on **Request for Bid/Quotation Form** and the bids will be advertised in local news publications where appropriate. If request for bid/quotation is to be published, a copy of the **Request for Bid/Quotation Form** with full specifications is sent to the Secretary of the Chief Executive Officer who arranged for the advertisement and provides a copy of the advertisement to Budget and Finance. A copy of **Request for Bid/Quotation Form** is directed to the Department/Program Director. All bids must be directed to the Budget and Finance Director.
- (f) Budget and Finance will open and review all bids/quotations with the Chief Executive Officer.
- (g) Once the Chief Executive Officer approves a bid, Budget and Finance is notified of the decision.
- (h) Budget and Finance inform the Department/Program Director of the decision, documenting action taken on Request for Bid/Quotation and notifying all bidders via a **Bid Denial Notice** or a **Bid Acceptance Notice**.

Specifications:

When specifications are developed for a Bid/Quotation from a vendor for vehicles, "Non-Acceptable" features which are considered "luxury" items must be identified in the solicitation.

Such items include, but are not limited to:

Dark Colors	Power Seats
White Wall Tires	Sun Roof

12. Equipment and Supplies

Purpose:

To identify and maintain a record of equipment and supplies purchased for the agency.

Inventory:

A list of all items purchased exceeding \$ 1,000, but less than the capital expenditure criteria, will be maintained by the Department/Program Director or designate.

Disposition:

Prior to the disposition of any equipment, the approval of the Grantor, Chief Executive Officer and/or the Board of Directors is required.

**E. INVOICE PROCESSING**

Policy:

Upon receipt of merchandise, an authorized staff member with the project, department, or administrative department must sign and verify the vendor's invoice by comparing it to the Purchase Requisition or Purchase Order and approving the items received.

Procedure:

Invoice computations and account distributions should be verified. Discounts, rebates, and other allowances are deducted from the vendor's invoice before submission for payment. The original invoice and delivery ticket (if applicable) should be submitted for payment or to support payment vouchers. The appropriate copy of the Purchase Requisition or Purchase Order should be completed, including verification of the "items received" columns, and a signed invoice or delivery ticket.

The vendor's invoice for partial shipment should be noted on the appropriate copy of the Purchase Requisition or Purchase Order to prevent duplicate payment. Purchasers will maintain a copy of the Purchase Order until the full shipment has been received.

**F. VOUCHER/CHECK REQUESTS**

Policy:

When a bill or invoice is approved for payment, a Voucher/Check Request is submitted to Budget and Finance. No check will be signed in advance and checks made payable to "cash" or "bearer" is prohibited. Checks will not be issued to contractors or vendors who have not received agency approval.

Procedures:

The **Voucher/Check Request** is completed as soon as possible after purchases have been made and invoice and other pertinent documents are available. No checks will be issued unless a receipt, signed invoices, bill or statement, and a copy of the Purchase Order or Purchase Requisition is attached.

Voucher/Check Requests must be submitted to Budget and Finance by Tuesday of each week by the end of the work day. Voucher/Check Requests that are incorrectly prepared are returned to the originator along with a **Check Request Form** and the reason(s) for returning the Voucher/Check Request is indicated. The Voucher/Check Request should be corrected and returned on the following Tuesday.

The Voucher/Check Request is to be properly dated reflecting invoice date; vendor's name and complete address; the check description reflects the invoice number, account number and/or other applicable information to identify payment; and coding must be filled in completely in accordance with the Chart of Accounts. Signatures of the originator and program director or supervisor must be on all Voucher/Check Requests. The originator prepares and signs the Voucher/Check Request. Execution by the Department/Program Director acknowledges that the purchase is an allowable cost in the budget and that funds are available for the expenditure.

Approved Check Request Form with attached documentation will be processed by Budget and Finance by the close of business day each Friday. The Budget and Finance Director's certification of all Check Request Form will be obtained prior to processing.

After computerized processing, checks are signed, reviewed and initialed by the Budget and Finance Director and/or designee. Budget and Finance will distribute and/or forward checks for mailing to the Executive Office Manager or designee by close of business on Friday of each week.

## **G. VENDOR APPROVAL**

### Policy:

Vendors and service contractors must be ALPI-approved. Properly executed contracts or service agreements must be on file in the Central Office of ALPI for those who provide services to the agency. The contracts or agreements must bear the signature of the Chief Executive Officer and the appropriate contractor. Checks will not be issued to non-ALPI-approved contractors or vendors.

### Procedures:

- (a) Before orders for goods or services are placed, requisitioner contacts Budget and Finance to determine whether or not the vendor or contractor is approved by the agency. If so, regular purchasing procedures apply.
- (b) If vendor or contractor has NOT been approved, requisitioner must take appropriate action to have proposed vendor or service provider approved by the agency. Budget and Finance provides a **Vendor/Contract Data Sheet** to the vendor or service provider for completion.
- (c) When a **Vendor/Contract Data Sheet** is returned and processed by Budget and Finance, the contractor or vendor's name is added to the official approved vendor listing and purchaser may proceed.

## H. LEASES

Budget and Finance will consider the relative cost advantage of "lease versus purchase" when appropriate. In weighing the decision as to "lease" or "purchase". Budget and Finance will document the pertinent elements evaluated as well as conclusions reached. This documentation is attached to the lease agreement kept by Budget and Finance and affixed to it.

The following points will be considered in the lease/purchase study. These are not necessarily all inclusive.

- (a) The cost of leasing over a 3-year period compared to the purchase price (including freight, installation)
- (b) Imputed interest and finance charges included in the lease payments.
- (c) Repairs and maintenance cost to ALPI under both options.
- (d) Personal property taxes cost, if applicable.
- (e) Insurance costs to ALPI under both options.
- (f) Availability of the property to ALPI without cost or substantial cost savings from other sources.
- (g) Availability of cash for purchase and lease payments.
- (h) Purchase options at various time periods.
- (i) Length of time the property will be needed.
- (j) Technological changes and the useful life of the property.
- (k) Trade-in value of the property.
- (l) Required approval of funding agencies.

Execution of the lease, lease-purchase, purchase, or other contract is the responsibility of the Chief Executive Officer. CAUTION: Legal counsel should be consulted before the contract is signed.

1. All leases will be approved and signed by the Chief Executive Officer.
2. Leases will correspond to program years whenever possible.
3. Original, executed lease agreements will be immediately forwarded to the Budget and Finance Director. Copies will be provided to appropriate programs/departments as requested.

## I. BENEFICIARY COMMITTEES AND BOARD EXPENSES

1. The individual incurring expenses while carrying out duties for the agency will complete and sign the **Authorization to Incur Travel Expenses Form**.
2. The **Authorization to Incur Travel Expenses Form** will be approved by the Chief Executive Officer.
3. Upon completion of the trip, the Voucher for Reimbursement of Expense Report Form with a Trip Report Form will be attached to a Check Request and submitted to the Chief Executive Office or designate for approval. The approved Check Request along with the appropriate forms will be submitted to the Finance Department for processing and payment.
4. The reimbursement checks will be prepared in accordance with Section VI - Voucher/Check Requests.
5. Reimbursement checks will be prepared in accordance with Section VI, Check Request Form.

THE AGRICULTURAL AND LABOR PROGRAM, INCORPORATED  
**Business Travel Expense and Reimbursement Policy and Procedure**  
**MANUAL**  
(revised 2013)

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**THE AGRICULTURAL AND LABOR PROGRAM, INCORPORATED**  
Business Travel and Expense and Reimbursement Policies and Procedures

**INTRODUCTION**

The policies and procedures herein, shall govern all travel at the expense of **THE AGRICULTURAL AND LABOR PROGRAM, INC** and the various programs it currently administers and/or directly operates. Authorization for travel will not be granted and expenses will not be reimbursed unless the travel is made and reimbursement is claimed in accordance with the policies and procedures herein. The allowances for travel expenses are set by **THE AGRICULTURAL AND LABOR PROGRAM, INCORPORATED** Board of Directors as determined by the various corporate, state and federal funding sources' travel expense reimbursement rules and regulations.

A unified expense rate for mileage, lodging and meals will be applied agency wide whenever possible. However, limited funding as well as limitations within prescribed State and Federal travel expense reimbursement rules and regulations makes this impossible to do. If the latter is the case, the applied expense rates will be governed by current State and/or Federal Per Diem Regulations. Otherwise, the following travel expense rates will be applicable Agencywide.

- \*\*1) The Mileage Rate will be @ 44.5 cents per mile or at the current rate as per approved by the Board of Directors;**
- 2) The Lodging and Hotel Daily Rate will be applied in accordance with the current **Federal Per Diem Regulations** with the following exceptions.**
- If Lodging is reserved in a hotel where pre-approved activity is scheduled, advance or reimbursement rate will be the actual cost (room rate plus applicable taxes).
  - If prior reservation is made in the area of a scheduled activity for which travel is approved, which reservation is not honored upon arrival, and are motels/hotels have no vacancies, reimbursement will be the actual per night cost for secured lodging. **THIS EXCEPTION MUST BE DOCUMENTED.**
- 3) The Meal Allowance Rate will be applied in accordance with **THE current FEDERAL TRAVEL Per Diem Regulations** with the following exceptions.**
- Meal cost incurred when travel destination begins and ends within a normal work day (8:00 A.M. - 5:00 P.M.) **IS NOT REIMBURSABLE.**
  - Meal cost that is included in a conference registration will be deducted from the daily meal allowance rate.
  - Tips for meal service in addition to the maximum daily meal allowance rate **IS NOT REIMBURSABLE.**

All other reimbursable travel costs (i.e. transportation, toll, parking, etc.) not referenced in this manual, must be reviewed and approved prior to the cost being incurred.

The limits on travel expenses set forth herein are not to be construed as an indication of amounts that should be spent. Instead, these are maximum amounts above which reimbursement will be questionable. All travelers traveling on behalf of the agency should be as conservative as good judgment and circumstances permit and expenses will customarily run less than the maximum limits.

The success of **THE AGRICULTURAL AND LABOR PROGRAM, INC.** depends on how well we can demonstrate our ability to deliver needed services to our clients and manage our financial resources. Adherence to the policies and procedures herein, should do much to demonstrate a sound and viable operation to our various funding sources.

Sincerely,

Deloris Johnson  
Chief Executive Officer

**THE AGRICULTURAL AND LABOR PROGRAM, INCORPORATED**  
**Business Travel and Expense and Reimbursement Policies and Procedures**

**PURPOSE**

The objective of this manual is to state the travel policy and procedures that are to be adhered to by all persons traveling on behalf of **THE AGRICULTURAL AND LABOR PROGRAM, INCORPORATED** and its programs hereafter referred to as the "Agency".

**SCOPE**

The scope of the policy and procedures herein, shall cover the agency's Board of Directors, Chief Executive Officer, Head Start Policy Council Members, Regional Advisory Council Members, Employees, Consultants and all other persons hereafter referred to as the "traveler" authorized and approved to travel on behalf of the Agency. No authorized traveler will be reimbursed nor will payments be made by the Agency on their behalf for excessive personal living expenses, gifts, entertainment, or other personal benefits.

**I. AUTHORIZATION TO TRAVEL**

**A.** All travelers traveling at the expense of the Agency must have official authorization prior to the anticipated travel being performed. Authorization levels are as follows:

<b>TRAVELER</b>	<b>REQUEST SUBMITTED TO</b>	<b>AUTHORIZED BY</b>
Board of Directors	Chief Executive Officer via Executive Office Manager	Board of Directors
Chief Executive Officer	Board of Directors via Board Chairperson	Board Chairperson
Head Start Policy Council Members	Head Start/EHS Director	Head Start/EHS
Regional Advisory Council Members	Regional Advisory Council Staff Liaison	Chief Executive Officer
Senior Management Staff	Chief Executive Officer	Chief Executive Officer
Program Managers and all Employees	Dept./Program Immediate Supervisor	Senior Director
Consultants and others	Chief Executive Officer	Chief Executive Officer

**B.** All travel authorized in accordance with the authorizations process detailed above will be guided by the following considerations:

1. The travel must be necessary for the proper execution of Agency business or in justifiable pursuit of Agency's educational and training objectives.
2. Ascertainment that selection of person(s) to attend meetings, conferences, training, etc., will coincide closely with employee performance needs and/or will enhance the mission and goals of the Agency.
3. Consideration of the minimum rather than the maximum number participants necessary to fulfill the above stated considerations.
4. Any special meetings, committee appointments, etc., where a Board Member, Policy Council member or Advisory Council member is requested to attend must be appropriately authorized and approved prior to the actual travel being performed.
5. Priority will be given to the Chairpersons of the ALPI Board of Directors, Head Start Policy and Regional Advisory Councils to attend meetings, conferences, seminars, etc., on behalf of their respective members.

C. The following forms must be prepared and submitted to properly execute the authorization and approval process:

1. **The Authorization to Incur Travel Expenses** form (TF 93-0001) must be completed by all travelers to summarize all anticipated travel and travel expenses for the month.
2. **The Travel Expense Estimate** form (TF 93-0002) must be completed with appropriate copies submitted along with **The Authorization to Incur Travel Expenses** form (TF 93-0001) to activate a request for a travel expense advance and/or to justify all anticipated travel expenses for each trip planned for the month.

D. The request for travel by all travelers is officially approved when **The Authorization To Incur Travel** form (TF 93-0001) and **The Travel Expense Estimate** form (TF 93-0002) have been properly signed, certified by Budget and Finance and approved by the Chief Executive Officer.

## II. TRAVEL EXPENSE ALLOWANCES

A. **Transportation** must be by the most direct route possible and any individual or group traveling by an indirect route is subject to bearing the extra expense incurred.

### 1. **Common Carrier**

All travel arrangements via a common carrier shall be based upon the most economical rate to the Agency.

Advantages must be taken of round trip rates, advance reservations and ticket purchase, Saturday Night stay, etc. No traveler shall use a mode of transportation that is more expensive than the cheapest round-trip airline ticket, Bus ticket or train ticket. If more expensive accommodations are required during an approved trip, an explanatory notation must be made on **The Travel Expense Estimate** form (93-0002). The traveler's copy of the common carrier ticket must be attached to the reimbursement and/or travel expense report.

### 2. **Limousine Services and Taxi Fares**

If authorized travel is by a common carrier, limousine, shuttle, or taxi, fares necessary to transport the traveler to and from the airport or station is a reimbursable cost. An official receipt (signed by the driver) for each fare must be attached to the Travel Expense report.

### 3. **Agency Vehicles**

Agency vehicles will be assigned to ALPI Employees upon approval of the Chief Executive Officer. Agency vehicles can only be used by employees conducting approved ALPI business. No agency vehicle is to be used for personal business unless written approval is obtained from the Chief Executive Officer via **The Agency Vehicle Usage Authorization** form (TF 93-0008). Each driver of an Agency vehicle is required to complete an **Agency Vehicle Mileage Trip Log** form on daily activities. This log is to be submitted to Budget and Finance with a copy forwarded to the Chief Executive Officer at the end of each month (by the 2nd working day). All drivers authorized to drive a Agency Vehicle, must maintain a good driving record, a valid driver's license and be eligible for coverage under any applicable agency insurance.

### 4. **Personally Owned Vehicles**

All travelers using their personally owned vehicle for work-related travel (in-town or out-of-town) shall be reimbursed at the approved mileage rate. All mileage to be claimed via **The Voucher For Reimbursement of Travel Expenses** form (TF93-0004) must show destination, purpose of travel, date/time of departure and return. Claims for gas, oil, parts or repair cost are not reimbursable expenses. Mileage computation shall be calculated using official road map and mileage charts

published by The State of Florida Department of Transportation or Map Quest. The request, authorization and approval process will be guided by the following considerations:

- a. All agency business travel using a personally owned vehicle must be officially authorized and approved via **The Authorization To Incur Travel Expenses** form (TF 93-0001) prior to any travel being incurred.
- b. Employees traveling from home to designated pre-approved work sites cannot receive reimbursement, if the mileage is less or equal to the employees regular home to permanent work site mileage.
- c. Where two or more travelers are traveling in the same vehicle, only one person may claim transportation reimbursable costs. Where more than one agency employee is traveling to the same destination for the same scheduled activity, staff members are encouraged to share personally owned vehicle means.
- d. Before approving a driver to use their own personal vehicles to conduct Agency business (i.e., hauling children, transporting other persons for the Agency) the existence of valid insurance and a valid driver's license must be verified.

#### 5. **Rental Car**

Authorization for rental car expenditures must be approved via **The Travel Expense Estimate** form (TF93-0002) prior to the actual rental. If authorization is granted, the traveler shall attach an official rental receipt to the Travel Reimbursement and/or Actual Travel Expense Report.

#### 6. **Toll Fees**

Fees paid for toll during official Agency travel is reimbursable. Receipts for any reimbursement claims must be attached to **The Voucher for Reimbursement of Travel Expenses** form (TF 93-0004).

### B. **Lodging**

Lodging cost incurred during overnight travel is a reimbursable expense. The maximum reimbursable expense for overnight lodging will be regulated by **The Federal Travel Per Diem Regulations** (see Appendix B) appropriate DOE travel rules and regulations and/or the Agency approved policy. To receive an advance for anticipated lodging cost, the traveler must include the cost in the official request to travel along with supported documentation. Hotel/Lodging receipts must be stamped "paid" and attached to the travel Reimbursement Claim report and appropriately submitted, certified by Budget and Finance and approved by the Chief Executive Officer before reimbursement is made and/or a travel advance can be cleared.

### C. **Reimbursable Meal Cost**

1. Meal Cost incurred when travel destination is in an assigned work area and/or within the traveler's normal work day is not reimbursable. Any exception must be reviewed and approved by the Chief Executive Officer prior to the cost being incurred.

2. Approved Meal Cost for out-of-town travel and/or overnight stay is reimbursable under the following conditions:

Time Schedule		MEAL TYPE
6:30 AM	8:00 AM	BREAKFAST
10:00 AM	1:30 PM	LUNCH
5:00 PM	7:00 PM	DINNER

3. When a meal cost allowance is approved via **The Authorization to Incur Travel Expenses** form (TF 93-0001), an appropriate meal allowance rate will be applied. The traveler's time schedule (Departure Time and Return Time) will be used to determine the anticipated and/or actual meal cost allowance. The cost determined will be prorated accordingly. **NO MEAL COST** will be reimbursable if the appropriate authorization and approval is not secured by the traveler prior to incurring the cost.

#### D. Miscellaneous Travel Expenses

1. **Registration Fee**

Registration fees in the amount necessary to qualify individuals to attend conventions, meetings, conferences, and banquets are reimbursable cost provided attendance at such function is appropriately authorized as an Agency sponsored and/or business related function.

Appropriate documentation (receipt, invitation, etc.) must be submitted with the travel advance request and/or reimbursement claim. **TRAVELERS SHALL NOT BILL AGENCY FOR MEAL COST COVERED UNDER A REGISTRATION FEE.**

2. **Expenditures for Tips, Gratuities, etc.**

Tips and gratuities are allowable reimbursement expenditures with the following exceptions;

- Tips for meal service in excess of the maximum meal cost daily rate **ARE NOT REIMBURSABLE.**
- Tips for airport porter service, Hotel bellman service, Taxi Service, etc., for baggage handling assistance are reimbursable up to \$1.00 per bag and/or up to \$25.00 per trip for all such services.
- Expenditures for valet service, entertainment, alcoholic beverages, etc. are considered personal rather than official expenditures and will not be subject to reimbursement.

All other expenditures for tips, gratuities, etc., must be appropriately authorized and approved prior to the cost being incurred.

3. **Telephone Calls**

Telephone calls included as hotel/motel/lodge expenses cannot be claimed as an official expense except when such calls are documented as business calls showing nature of call, person telephoned, telephone number, city, state, and time of call. All Agency employees, Board members, Advisory Council members and Head Start Policy Council members will be allowed up to \$3.00 per day for personal calls home. **APPROPRIATE DOCUMENTATION** must be submitted with the travel reimbursement claim.

#### 4. **Automobile Parking**

Meter parking expense incurred is not reimbursable. Expense incurred when using a parking garage and/or parking arrangements with an on-site attendant is reimbursable if:

- a) Length of parking time corresponds with agenda of official activity for which travel is approved.
- b) Parking ticket showing actual cost, date of transaction and parking lot attendance signature, when appropriate.

### III. **TRAVEL EXPENSE ADVANCES**

- A. An advance to incur travel expenses must be requested and processed in accordance with Section I of this manual.
- B. All travelers requesting a Travel Expense Advance will be required to adhere to the following procedures:
  1. Funds received must be accounted for at the conclusion of the trip. Any amount that cannot be properly documented and/or accounted for by an official receipt must be refunded to the Agency by cash or check. Such refund must be submitted with the Travel Expense Report.
  2. If the actual authorized travel expenses are in excess of the travel advance, the Agency will reimburse the traveler for the excess amount. Such request must be supported by proper documentation and official "paid" receipts.
  3. If authorized travel (a projected trip) is canceled after a travel expense advance has been obtained, the traveler must prepare a travel reimbursement report no more than five (5) days after cancellation notification. Such report and the appropriate refund must be submitted along with the Travel Expense Report.
  4. All travelers receiving a Travel Expense Advance must clear the advance within 30 days after the official travel has been completed. All travel expense advances not cleared after a 30 day period will be subject to a direct payroll deduction and/or a denial of any future travel expense advances until the outstanding advance is cleared and/or properly accounted for.
  5. All delinquent travel expense advance accounts of all travelers traveling on behalf of the Agency will be reviewed by the Chief Executive Officer in consultation with Budget and Finance and the appropriate senior manager with same reported to the ALPI Board Executive Committee when necessary to appropriately account for all travel related funds due to the Agency in a timely manner.
  6. The following forms must be prepared and submitted to properly execute the authorization and approval process as prescribed in Section I of this Manual, to request and/or to clear a Travel Expense Advance.
    - a. **The Travel Expense Estimate form (TF 93-0002)** must be completed for each trip requiring Travel Expense advance with appropriate copies of same, submitted along with **The Authorization To Incur Travel Expenses form (TF 93-0001)** and a **Voucher/Check Request Form (TF 93-0003)**.

- b. To clear a travel expense advance, the traveler must complete and submit:
  - 1. The Expense Report (Actual) section of **The Travel Expense Estimate** form (TF 93-0002).
  - 2. **The Trip Report** Form (TF 93-0005).
  - 3. **Voucher for Reimbursement of Travel Expenses** Form (TF 93-0004).
  - 4. **Corporate Care Billing/Expense Report Summary** Form (TF 93-0007) when applicable.
  - 5. Copy of the **Authorization To Incur Travel Expenses** (TF 93-0001).

#### **IV. TRAVEL EXPENSE REIMBURSEMENT REPORT**

- A. All travel expense reimbursement reports and requests must be properly authorized, in accordance with Section I of this manual, certified for payment by Budget and Finance and approved by the Chief Executive Officer before payment is made and/or a travel expense advance can be cleared.
- B. Applicable forms as prescribed in Section III, must be completed and submitted by all travelers to complete the Travel Expense Reimbursement Report process.

#### **V. CORPORATE CREDIT CARDS**

- A. Corporate Credit Cards will be provided to designated travelers for the sole purpose of conducting official corporate business.
- B. No personal items and/or expenses are to be billed to any Agency (directly billed) Corporate Credit Cards including but not limited to, (Telephone Credit Card, Gas/Service Credit Card, American Express, etc.).
- C. All transactions charged to a corporate credit card shall be reported in accordance with the process prescribed in Section I and III of this manual.
- D. Improper use of a corporate credit card will result in loss of usage privilege. All such cases will be reviewed by the Chief Executive Officer in consultation with Budget and Finance, the appropriate senior manager with same reported to the ALPI Board Executive Committee when necessary, to appropriately recover any improper or unauthorized funds charged to a corporate credit card.
- E. Each traveler and/or employee issued a Corporate Credit Card will be required to read and sign a copy of the **Corporate Credit Card Usage Authorization** form (TF 93-0009) with a copy of same forwarded to Budget and Finance for future reference and payment certification.

#### **VI. TRAVEL ARRANGEMENTS AND LOGISTICS**

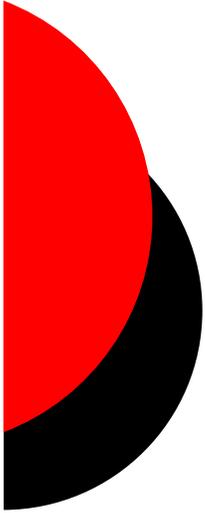
- A. In order to control cost and qualify for volume discounts, all travel arrangements for all authorized travelers must be coordinated with the Executive Secretary and/or authorized designate. This includes reservations for common carrier transportation (i.e., airline, train, bus, rental care, etc.) and lodging as well as arrangements for Agency sponsored meetings, training sessions in hotel facilities and/or direct billing accounts
- B. All such arrangements must be appropriately authorized and approved in accordance with Section A of this manual before any travel arrangements are confirmed and/or travel expenses obligated.

## APPENDIX A

TF 93-0001	AUTHORIZATION TO INCUR TRAVEL EXPENSES
TF 93-0002	TRAVEL EXPENSES ESTIMATE
TF 93-0003	VOUCHER/CHECK REQUEST
TF 93-0004	VOUCHER FOR REIMBURSEMENT OF TRAVEL EXPENSES
TF 93-0005	TRIP REPORT
TF 93-0006	AGENCY VEHICLE MILEAGE TRIP LOG
TF 93-0007	CORPORATE CARD BILLING/EXPENSE REPORT
TF 93-0008	AGENCY VEHICLE USAGE AUTHORIZATION
TF 93-0009	CORPORATE CREDIT CARD USAGE AUTHORIZATION

## APPENDIX B

- A. The Federal Travel Regulations (current)
- B. State DOE Travel Regulations (current)



**The Agricultural and Labor Program, Inc.**

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**Advisory Council  
Policy Committee  
&  
Policy Council  
Handbook**

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# THE AGRICULTURAL AND LABOR PROGRAM, INC.

## Councils Handbook

### Purpose of Handbook

This handbook has been prepared as a guide for Council members to assist them in carrying out their functions as advisors to the Agricultural and Labor Program, Inc. (herein referred to as ALPI. It contains information on: (1) the purposes and functions of the Councils, (2) the importance of their work as volunteers, (3) guides on how to organize themselves to carry out their work, (4) suggested ways to identify and solve problems, (5) techniques for planning their work, and (6) strategies for gaining support for the organization.

A section has been included on how to conduct meetings and the use of committees to perform tasks for the Councils, and the value of completion of assigned tasks by committees. Careful thought has been given to clarifying advisory functions, and the distinctions between those bodies that are advisory and those bodies that have decision-making responsibilities.

ALPI, like many organizations of its type, gains great benefit from advisory groups that are representative of the people the organization serves.

### Functions of Councils

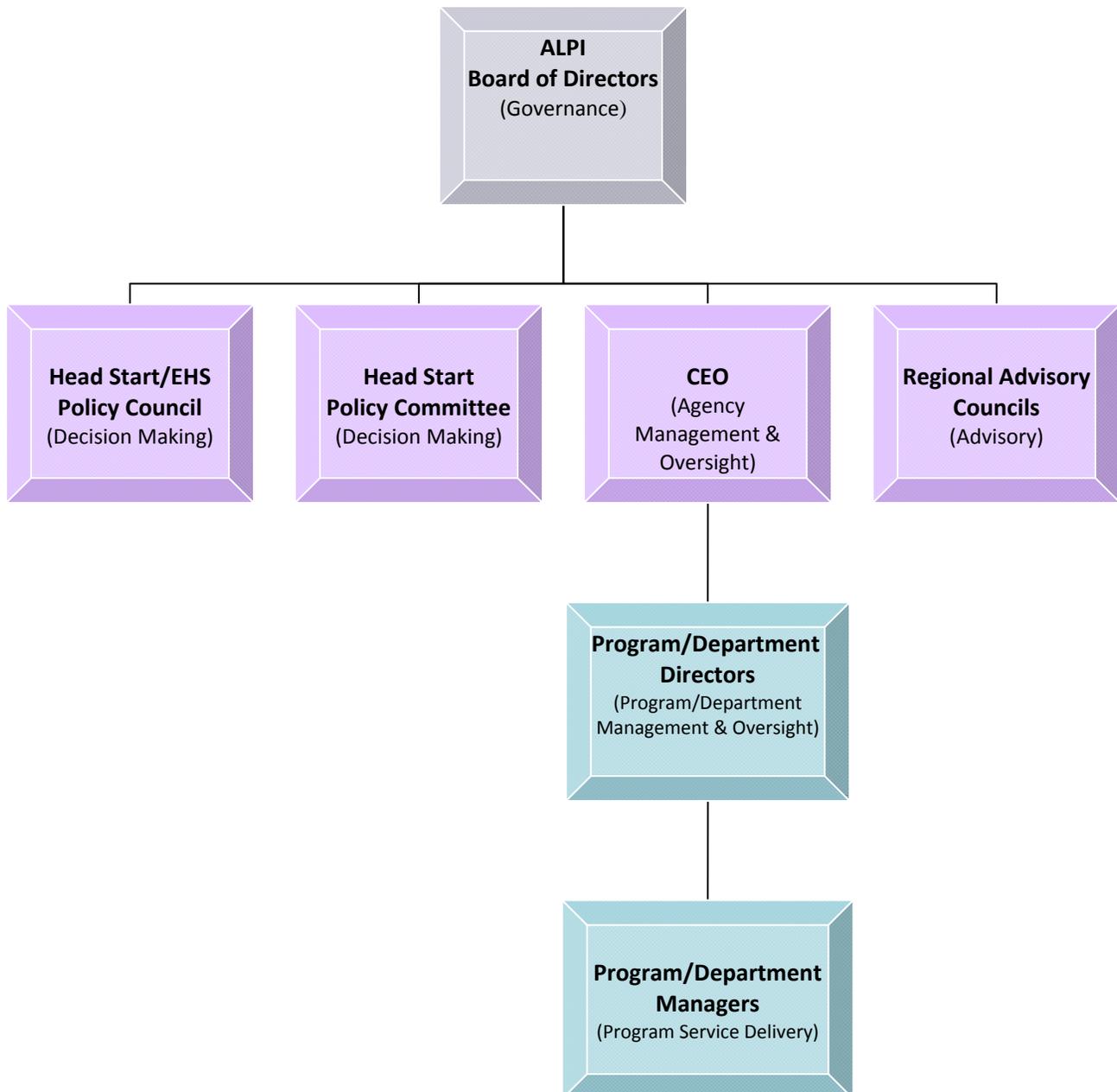
Councils to the organization serve important functions, and although their purposes may vary according to the mission of the organization, they are vital to the success of the organization. Councils: (1) are good will ambassadors, (2) are knowledgeable about the missions of the organization, (3) support the organization, (4) are vital communication links to the communities that the organization serve, and (5) seek at all times to follow the rules designed by the organization. ALPI is a comprehensive social services organization. Its mission is to help improve the general quality of the lives of those individuals in the counties in the State of Florida in which it has programs. ALPI does not generate money on its own to operate the programs which serve the targeted population. It must seek financial resources from public (government), private (corporations), and charitable sources (United Way/Foundation). Its services, programs and operations all depend on gifts and grants from public and private organizations. There are never enough financial resources for ALPI to meet the needs of all the targeted population. However, ALPI does seek constantly to acquire more resources to serve more people.

Unlike the Policy Council and Policy Committee who are decision makers, the advisory councils do not make decisions for the organization. They advise decision-makers who may use the advice given them in making decisions for the organization. The Advisory Councils share their views, give suggestions and advice to the Board members of ALPI. Council members from time to time participate in surveys, needs assessments and assessments of effectiveness and performance of the organization. Information obtained through surveys, advice on selected issues and other forms of information gatherings are used by Board members in making policies for the organization and by the staff of ALPI in designing and operating programs.

## Governance . . . Roles and Responsibilities

The Agricultural and Labor Program, Inc. (ALPI) is a non-profit Organization that is governed by an 18 (voting) member board of Directors. The ALPI Board membership consists of representatives from the Regional Advisory Councils, the Head Start Policy Council and the community at large. The ALPI is governed in accordance with its established By-laws which include the function and purpose of the Councils.

### **AGENCYWIDE GOVERNANCE & MANAGEMENT FUNCTIONS AT A GLANCE**



Further, while considering the flow of information (as well as roles and responsibilities), it is critical to note that all reports made to the Board of Directors from Councils should specifically include what is taking place in the area being served by each individual Council. To facilitate the flow of information, all reports that are presented to the Board will also be made available to the Advisory Councils.

Although questions and/or comments are welcomed, it is important to understand that the Council's (except the Policy Council and Policy Committee) main focus and function should be that of *advisement and/or recommendation to the Board*. This is an extremely important function as it provides input directly from the areas being served by ALPI, thus making the Councils the eyes and ears of the Board. However, the decision making function itself is reserved solely for the Board.

If the above purposes and functions of the ALPI Councils are understood and followed, the collective energy of councils, board of directors, and staff can make a significant contribution to the achievement of the mission of ALPI.

# Ready? Set? Go!



## **Organizing to Do Your Work**

Most organizations divide their work among its members in order to systematically perform tasks and place responsibility. Each Council can be more effective if it sets up committees in addition to its officers. Such committees may be the following: Publicity Committee, Fund-Raising Committee, Special Events Committee, Public Official Contact Committee and Program Committee.

## **Use and Functions of Committees**

A committee is a body of one or more persons appointed by the Council Chairperson or elected by the Council to consider, investigate, or take action on certain matters or subjects. Committees that are organized and effective in their work can save the Council valuable time. Time is saved because the committee performs much of the leg work which eliminates the need for the full Council to go over every detail of every issue. After the work of the committee is completed, it is important to report the information it has gathered to the Council. Below are some reporting procedures committees should follow:

- Keep the report as brief and to the point as possible without negatively affecting the quality of the information.
- The report should be distributed to appropriate Council members before the meeting of the full Council.
- Indicate if the report is for information purposes or if some action is required by the full Council. If action is required, the committee should make a recommendation on the action the Council should take.
- If the Council decides to adopt the committee's report, the Council may vote to accept the report as its own. The report then becomes the Council's official position on the issue.

The committee chairperson plays a very important part in the successful functioning of the committee. If you have been selected to chair a committee, but you are not clear about how to perform as a chairperson, here are a few suggestions:

As chairperson you are responsible for ensuring that the committee functions. This does not mean that you are to do all of the work yourself. You should call meetings, set the agenda, stimulate discussion and record decisions and recommendations.

- Clarify your assignment. Be clear concerning what the Council has asked the committee to do.
- Be sure the committee members stay focused on the objectives to be achieved.
- Limit your activities/work to that which has been specified by the Council.

In ordinary organizations there are two types of committees:

- (1) Standing Committees:** Standing committees remain in existence permanently or for the life of the group that established them. Standing committees are authorized specifically under the organization's by-laws.
- (2) Special Committees (Select or Ad hoc):** These committees are appointed as the need arises to carry out a specific task at the completion of which it automatically ceases to exist. A special committee should not be appointed to perform a task that falls within the assigned function of an existing standing committee.

### Conducting Meetings

Business meetings are typically the most widely recognized form of assembly used by organizations. Meetings allow members to come together in an organized fashion to discuss and decide upon organizational issues. In order for meetings to be carried out in an orderly manner, it is important for members to observe established rules. Rules establish how members of an organization are to conduct themselves in a meeting setting. A discussion of basic rules of order which should be observed when conducting a formal meeting follows.

### Rules of Order

**Call to Order** – When the time of the meeting has arrived, the presiding officer opens it by calling the meeting to order.

**Order of Business** – Determine the order in which business is conducted in a meeting:

1. Reading and approval of minutes
2. Reports of officers, boards and standing (these are permanently established) committees
3. Reports of special (select or ad hoc) committees. (These are committees appointed to exist only until they have completed a specified task.)
4. Unfinished business (matters previously introduced which are carried over from the preceding meeting)
5. New business (matters which are initiated in the present meeting)

**Obtaining and Assigning the Floor** – Before an individual can make a motion, he/she must be recognized by the chair. This indicates that the recognized person has the exclusive right to be heard at the time. To claim the floor, an individual rises at his/her place when no one else has the floor, faces the chair, and asks for the floor or to speak. If two or more members rise at the same time, the individual who rose and addressed the chair first is entitled to be recognized. If at any time the chair makes a mistake and assigns the floor to the wrong person, such an error is corrected by raising a point of order.

**Making a Motion** – There are three (3) steps by which a motion is normally brought before the assembly:

1. A member *makes* the motion.
2. Another member *seconds* the motion.
3. The chair *states the question on the motion*.

Only the chair can place a motion before the assembly. When the chair has stated the question, the motion is *pending*. It is then open to debate. If the assembly decides to do what the motion proposes, it *adopts* the motion or the motion is *carried*. If the assembly expressly decides against doing what the motion proposes, the motion is *lost* or *rejected*.

### **Planning for Work and Action**

All kinds of organizations engage in planning to reach objectives and goals and to carry out their missions. ALPI Councils engage in planning activities in at least two ways. The Councils are called upon from time to time to participate in the planning activities of ALPI, such as the five-year plans and adjustments to those plans. The Councils engage in planning when they decide on their ongoing activities within their respective regions.

It has been long established that systematic planning is a fundamental first step to use resources wisely and to accomplish goals. The outline presented below includes basic steps and activities that are essential to orderly planning:

### **Sequential Stages of Systematic Planning**

- I. Examine and understand the mission of ALPI
  - A. Familiarize yourself with the ALPI five-year plan
  - B. Develop an understanding of how the Councils are related to ALPI and the five-year plan
  - C. Brainstorm (talk, discuss, speculate) on how the Council and its members can assist ALPI in carrying out the goals of the five-year plan
  - D. Agree on what the Council will do and what each member will do in supporting the achievement of the goals of the five-year plan.

- II. Establish a set of objectives/goals to be achieved and prioritize these goals/objectives.
  - A. Decide on the objectives/goals and determine if they fit with the mission of ALPI.
  - B. Collect information about the goals/objectives.
  - C. List the goals/objectives in priority order.
  - D. Write the objectives/goals clearly.
  - E. List steps to be taken and determine needs, i.e. step 1, step 2, step 3, etc.
  - F. Raise questions and list tentative answers, e.g. What needs to be done? What people should be contacted? What materials and funds are needed?
  - G. Record progress and revise action steps as necessary.
  
- III. Assess the area in which your council is located.
  - A. Gather information on the population in your area. (Key individuals and groups are important to the success of all your activities.)
  - B. Determine which individuals and organizations are important to your particular objective/goal.
  - C. Interact with important individuals and organizations within the ALPI target population and those outside of ALPI.
  
- IV. Develop strategies and action plans for achieving goals/objectives.
  - A. Assign individuals to each task and develop action steps for each individual. Record all steps.
  - B. Check frequently on the progress of each step.
  - C. Maintain open communication.
  
- V. Agree on timetable for implementation of objectives/goals.
  - A. Write out the timetable – set time and dates of each activity.

- B. Determine in the timetable what can be done when and adjust timetable when necessary.
  - C. Coordinate all activities – reprioritize and follow up on all steps and actions to reconcile for delays.
- VI. Create an information network and flow system to monitor all actions.
- A. Examine information to assess where you are and where you are going.
  - B. Share all information frequently.

### **Problem Solving**

As individuals we all experience problems and as a result we all at some point engage in problem solving. As Council members, the problems that you may encounter in the performance of your duties on a day-to-day basis are varied. The problem to be solved could be as simple as identifying the available services that ALPI could provide for a needy family, or as complex as solving problems which could result from the expansion of an existing service area. Regardless of the problem to be solved, there are problem-solving steps which can be used to make it easier. By simply following the steps provided below, problems which you encounter can be broken into manageable pieces and resolved.

### **Problem Solving Steps**

#### **Step 1: Identifying and Selecting a Problem**

A problem should be identified and well defined. The definition should be expressed in terms of how it affects the operation of an organization or interferes with the activities of a group.

#### **Step 2: Analyzing the Problem**

The facts about the problems and the causes of the problem should be determined.

#### **Step 3: Generating Possible Solutions**

Evaluate the alternative solutions by considering the pros and cons of each and the consequences that may occur from the solution selected.

#### **Step 4: Select and Plan a Solution**

Continue the process of weighing the pros and cons of options considered in Step 3. Explain why the solution chose was selected and begin planning actions and solutions to the problem.

#### **Step 5: Implement the Solution**

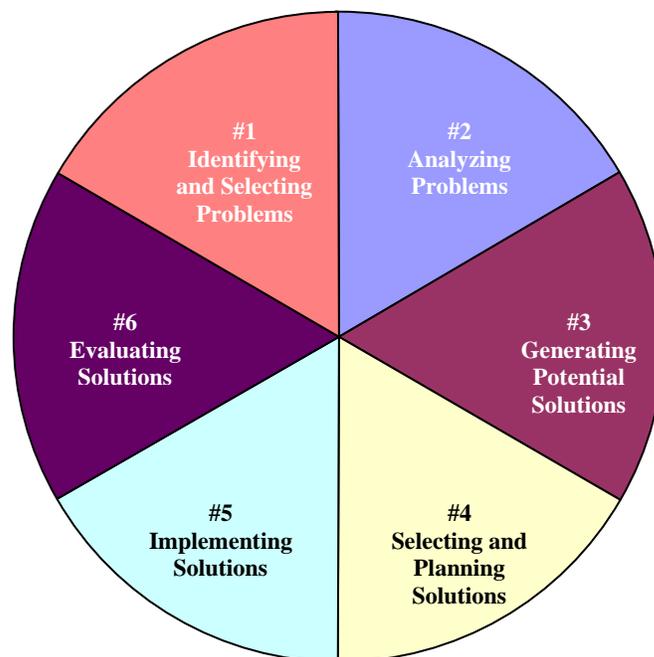
Consider who is to be notified about the decision, determine the steps to be taken to implement the decision in sequential steps (1, 2, 3, 4) and assign individuals to carry out action steps 1, 2, 3, 4.

### **Step 6: Evaluate the Solution**

Observe, inquire and get feedback from those affected by the decision. If the decision was made to improve a situation or problem that can be measured in output, cost or other measurable means, use such measure to determine if the need, problem or situation has been met, solved or improved.

*The problem-solving process is not difficult to understand and can be applied to almost any kind of problem by almost any kind of group. The process can be led by a facilitator or a manager, or it can be used by a group without a leader.*

## **The Problem Solving Process**



*As illustrated above, the sequence of problem solving steps is:*

- Step 1 – Identify and Select a Problem
- Step 2 – Analyze the Problem
- Step 3 – Generate Potential Solutions
- Step 4 – Select and Plan a Solution
- Step 5 – Implement the Solution
- Step 6 – Evaluate the Solution

## **Gathering Resources and Support**

Non-profit service organizations must seek resources and support from many sources in order to carry out their work. The ALPI staff and board of directors are constantly engaged in obtaining support for its programs. Councils in consultation with and approval of the staff and board may engage in supportive efforts for ALPI and their own activities. All such efforts must be coordinated to avoid conflicts and to ensure that ALPI and all of its units work together toward common goals.

Support may come in the form of money and material gifts or in the form of volunteer efforts from governmental and political sources. Depending upon the kind of resources and support that are needed, Councils may seek, through coordinated arrangements with ALPI, support from community sources, through cooperative relationships and political activities. Listed below are groups and organizations of the three types given above that are often sources of support.

### **Community Resources**

1. Civic Organizations
2. Sororities and Fraternities
3. Businesses
4. Professional Societies and Associations
5. Churches
6. Universities and Community Colleges
7. Foundations and Individual Philanthropists
8. County Agencies
9. City Departments

### **Cooperative Relationships**

1. Cooperate with community improvement groups.
2. Communicate and publicize your programs to the community.
3. Establish an information bank containing information about ALPI Programs and other community programs.

### **Political Action**

1. Register, vote and encourage others to register and vote.
2. Identify public officials in your city, county, district and state.
3. Develop knowledge and understanding of how the political system works.
4. Get to know the staff of your elected officials.
5. Monitor the legislative activities on legislation that affects your community.

6. Gain knowledge about proposed programs, projects and funds available to your community.
7. Communicate through the mail with your elected officials.
8. Organize trips and visits to meetings of the city and councils and to sessions of the State Legislature.

***All of the above suggested activities must be planned and coordinated with ALPI in order to be fully effective.***

# APPENDIX A

## MEETINGS

### ❖ Regular Meetings

Regular meetings of the **Head Start/Early Head Start Policy Council and Head Start Policy Committee** shall be held once a month except July and August. The exact meeting date and time will be determined yearly by a majority vote during the annual Orientation of new members. Monthly meetings will begin in October of each year. (See Head Start/Early Head Start By-Laws for details)

Regular meetings of the **Regional Advisory Councils and the ATEC Advisory Committee** shall be held not less than four (4) times annually, inclusive of the council's annual meeting. No meetings will be held July and August. The exact meeting date, time and location will be determined yearly by a majority vote during the annual Shared Governance Orientation. Each meeting shall be held at least 30 days prior to each board meeting. All Meetings shall be open to the public unless exempt from Section 286.011, Fla. Stat.

All meetings shall be conducted in accordance with the most recent edition of "Roberts 'Rules of Order."

### ❖ Special /Call Meetings

There will be special meetings of the **Policy Council and the Policy Committee** only when there is a need, and the Chairperson shall call all special meetings at least 48 hours in advance. (See Head Start/Early Head Start By-Laws for details).

Special or emergency meetings of the **Advisory Councils and Advisory Committee** shall be held when called by the Chairperson of the Council/Committee, or by any three (3) Council/Committee Members. Notice of all such meetings will be provided not less than twenty-four (24) hours prior to such meeting.

### ❖ Notice of Meetings

Written notices shall be prepared by designated management staff in consultation with the Chairperson and mailed to each **Head Start/Early Head Start Policy Council/Committee member** at least (5) days prior to the date of each regular meeting. A copy of the agenda for the meeting will also be enclosed. Notices of special meetings shall be mailed to each member at least 48 hours prior to the date of the date of the meeting, with an explanation for the special meeting. (See Head Start/Early Head Start By-Laws for details).

Written notices shall be prepared by designated management staff in consultation with the Chairperson and mailed to each **Advisory Council/ Committee member** at least (5) days prior to the date of each regular meeting. A copy of the agenda for the meeting will also be enclosed. Notices of special meetings shall be mailed to each member at least 24 hours prior to the date of the date of the meeting, with an explanation for the special meeting. Additionally, the notice will be prominently displayed on the agency's website and in the area of the agency's offices set aside for that purpose.

### ❖ Quorum

A majority of 51% of the members of the Policy Council/Committee, Regional Advisory Council and Committee must be present to constitute a quorum in order to transact business for regular or special meetings. An attendance Roster must be completed and included in the Council/ Committee report to the Board.

❖ Meeting Minutes, Reports, Recommendations

Meeting Minutes must be submitted to the designated management staff person at least seven (7) days following the Council/Committee meeting. The minutes will be included in the Council/Committee's report along with attendance report, recommendations and other relevant documentation and submitted to the Board of Directors prior to the Board meeting. Each council must use the Board's approved reporting format and attendance sheet. (See Attachments 1 & 2).

❖ Special Events and Fundraising Activities

All Special events and fundraising activities must be submitted to the Board of Directors for review and approval consideration at least 120 days before the date of the event. Sample of past events included the following:

- Scholarships
- Christmas Baskets/gift cards
- Raffles

❖ Allowances and Reimbursements

No Council/Committee member shall receive and compensation for any service that she/he may render as a Council/Committee member. Members may be reimbursed for her/his actual expenses, including babysitting, travel, etc., incurred in the performance of her/his duties as Council/Committee member.

❖ Removal

The Council/Committee may, declare the office of a member of the Council/Committee vacant in the event such member shall be absent from three (3) regular Meetings unless such Member provides written notification to the Secretary of the Council after the second absence and said absence(s) are excused by the Council/Committee. Said notification must be submitted no later than seventy-two (72) hours prior to the scheduled Council/Committee meeting. If the member is unable to provide the requisite notice, the Chairman of the Council/Committee will have the authority to make the determination as to whether the absence is excused. Designated management Staff will notify the Member by letter of this impending action after the second absence.

Any Member may be removed by a two-thirds vote of the Council/Committee, for cause, at any regular meeting thereof, provided the member is informed of the basis of the complaint against her/him in writing, at least seven days prior to the meeting and is given an opportunity at the meeting to respond to the allegations, prior to the Council/Committee's vote.

# APPENDIX B

## COUNCIL ELECTION PROCEDURES

To ensure the Agricultural and Labor Program Compliance with all applicable laws and funding regulations, all existing Regional Advisory Councils are hereby requested to abide by the following bylaws articles and procedures regarding the eligibility, term of office and election of 2011 Regional Council Members and officers.

### Purpose:

In accordance with the Bylaws of The Agricultural and Labor Program, Incorporated Article II Section 1 *The specific purpose for which this Corporation is formed is to assist agricultural workers, disadvantaged, disenfranchised persons and other interested members of the community and their family members in cooperatively meeting their needs for better health, education, social services, home life, economic opportunities and human relations. In furtherance of this purpose, the Corporation shall have all powers conferred by Chapter 617 of the Florida Statutes, including but not limited to the following powers: ...to create an Advisory Council in each of the four regions currently in operation, Southern, Eastern, Central and Northern, and to continue same in any new region that may be created for the purpose of aid and counsel to the Board of Directors...*, all existing Regional Advisory Councils are to adhere to the Bylaws of The Agricultural and Labor Program, Incorporated following Article, Sections and Procedure Clarifications regarding the eligibility, term of office and election of 2011 Council Members and Officers.

### DEFINITION OF REGIONS

#### Central Region Target Areas

- **North Osceola County**
- **Hillsborough County**  
(Dover, Ruskin, Wimauma, Plant City)
- **North Polk County**  
(Lakeland, Bartow, Lake Alfred, Auburndale, Winter Haven, Haines City, Mulberry, Polk City, Davenport, Bradley, Waverly, Poinciana, Wahneta, Eagle Lake, Gordonville, Eloise, Gordon Heights)

#### Southern Region Target Areas

- **Highlands County**  
(Avon Park, Sebring, Lake Placid)
- **Southern Polk County**  
(Lake Wales, Ft. Meade, Frostproof)
- **Southern Osceola County**
- **Hendry County**  
(Labelle, Clewiston)
- **Glades County**  
(Moore Haven)
- **Collier County**  
(Immokalee & Naples)
- **Hardee County**  
(Wauchula, Bowling Green, Zolfo Springs)

#### Northern Region Target Areas

- **Brevard County**
- **Seminole County**  
(Sanford)
- **Volusia County**  
(Deland, Pierson)
- **Lake County**  
(Leesburg)
- **Putnam County**  
(Crescent City)
- **Pasco County**  
(Dade City)
- **Orange County**  
(Apopka, Orlando, Winter Park, Zellwood)

#### Eastern Region Target Areas

- **Okeechobee County**  
(Okeechobee)
- **St. Lucie County**  
(Ft. Pierce, Port St. Lucie)
- **Palm Beach County**  
(Belle Glade, South Bay, Pahokee)
- **Martin County**  
(Indiantown, Hobe Sound, Stuart, Port Salerno, Jensen Beach)
- **Dade County**  
(Florida City)
- **Indian River County**  
(Vero Beach, Gifford, Fellsmere & Wabasso)

## ARTICLE X - REGIONAL ADVISORY COUNCIL

- Section 1** The Corporation membership shall be divided into four (4) regions: Southern, Eastern, Central, and Northern, with each region having a Regional Advisory Council. The regions shall be designated by the Board of Directors.
- Section 2** Regional Advisory Councils shall serve in an advisory capacity to the Board of Directors.
- Section 3** The Regional Advisory Council shall have a membership of not less than six (6) or more than eighteen (18).

### PROCEDURE CLARIFICATION

*All corporate members of a said region must have declared eligibility including residency via the corporate membership process to be eligible to serve on a said advisory council.*

- Section 4** No employee of the agency may serve on any Regional Advisory Council. Former employees must be out of service for at least one (1) year before becoming eligible to serve on any Regional Advisory Council.
- Section 5** No member of a Council Member's immediate family shall serve as a Council Member of the same Regional Advisory Council during the same time as that Council Member. Immediate family is defined as follows: Husband, Wife, Mother, Daughter, Son, Father, Father-in-Law, Mother-in-Law, Sister, Sister-in-Law, Brother, Brother-in-Law, Grandmother, Grandfather, Aunt, Uncle, Niece, and Nephew.
- Section 6** Regional Advisory Council membership shall be for three (3) year periods. There shall be an annual meeting of the Corporate Membership in each of the four (4) previously identified regions. Said meeting will be held each year before the end of November. Those in attendance and who are entitled to vote shall elect Regional Advisory Council members. At each annual Regional Advisory Council meeting six (6) persons shall be elected for three year terms. It is the intent of this provision to continue to provide for staggered three year terms with a total of eighteen members for each Regional Advisory Council.

### PROCEDURE CLARIFICATION

*All eligible Council Members present may submit their name in nomination via the Nomination Committee or may be nominated from the floor to fill any vacant slot at the time of the election.*

*A vacancy slot thereafter in any Council Membership and/or Council officer's slot may be filled by election by a majority of the council members present at a duly held council meeting. The elected officer and/or member shall serve for the remainder of the term of the office and/or membership slot she/he replaces.*

Once sworn-in as Regional Advisory Council members, they shall immediately elect their officers and their representatives to the Board of Directors. All members elected to the Board of Directors shall be representatives of the low-income communities of said region. Regional Advisory Council officers may be elected as a low-income community representative if appropriate.

### PROCEDURE CLARIFICATION

*All Advisory Council Members seeking consideration to represent the council on the Board must have been a council member for not less than two years.*

- Section 7** If requested by the Board of Directors, the Regional Advisory Council shall recommend elected officials and local business/other representatives for consideration for appointment to the voting membership of the Board. The Board of Directors shall have the sole responsibility for making appointments of elected officials and local business/other representatives,
- Section 8** All other designated subsidiaries and affiliates of ALPI shall fully comply with and adhere to these Bylaws as well as all applicable Policies and Procedures.

## ATTACHMENTS

1. Attendance Report Form
2. Meeting Report Form
3. Travel Request to Incur Travel Form
4. Travel Reimbursement Form

# PARLIAMENTARY PROCEDURES



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WHAT YOU NEED TO KNOW...

October 6-7, 2021

# OBJECTIVES

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- 1) State the purposes of following the Parliamentary Procedures
- 2) Recognize the five basic principles of Parliamentary Procedures
- 3) Identify steps involved in presenting a motion

## OBJECTIVE 1

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**State the purposes of following  
the Parliamentary Procedures**

To give every member a chance to be heard



To allow everyone to be a participating member in an orderly group



To establish and maintain order in a meeting



To prevent confusion when discussing business



To keep the meeting moving



# OBJECTIVE 2

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Recognize the five basic principles of the parliamentary procedures

# FIVE BASIC PRINCIPLES

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- **Discuss one subject at a time**
- **Allow full and free discussion of each idea presented**
- **Treat all members with respect and courtesy**
- **Carry out the rule of the majority, and respect the rights of the minority**

Bring together the wishes of all group members to form a cooperating, united council



# OBJECTIVE 3

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Identify steps involved with  
presenting a motion

# MOTION

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- A motion is a formal way to bring an idea, proposal, or plan of action before a group.
- A motion is part of an orderly way to conduct business using parliamentary procedure
- A motion calls for discussion and action by the group

# Steps to Make and Handle a Motion

- Discussing
- Amending
- Voting



A member who wants the council to do something makes a motion



➤ The member must address the Chairperson

➤ The member must be called on by the Chairperson



➤ The member may make a motion by saying, “I move...”



- The motion is then seconded by another member



- The chairperson restates the motion and asks for a second

- Discussion is held on the motion



➤ Repeat the motion

“Are you ready for the question?”



➤ A vote is taken to ask who is in favor of, and who is opposed to the motion



- All in favor say  
“Aye;” all opposed  
say “Nay”



- “The motion is  
passed.” -OR -  
“The motion is  
lost.”



Before another motion can be made, a motion that is seconded must either be:

- Voted on
- Withdrawn
- Amended
- Tabled



# To Amend a Motion

- An amendment is recognized
- The amendment is seconded.
- Discussion is held.
- A vote is taken on the amendment.
- If approved discussion is held on the amended motion.
- A vote is taken on the amended main motion.
- Any number of amendments may be made one after the other



# To Withdraw a Motion

Both the person who made the motion and the person who seconded the motion must agree that it be withdrawn



# To Table A Motion

If more information is needed, or there is not enough time to discuss and vote on a motion, it may be tabled.

- A member moves to table the motion.
- Another member seconds the motion.
- A vote is taken
- No discussion is taken, but tabling does require a majority vote to pass







*That's all Folks!*

# CSBG IM #82 Tripartite Boards

Publication Date: June 12, 2012

**Transmittal No. 82**                      **Date: March 23, 2005**

**TO:** State Community Services Block Grant Program Directors, Community Services Block Grant State Association Directors and Community Services Block Grant Eligible Entities

**SUBJECT:** Tripartite Boards

**PURPOSE:** This Information Memorandum addresses a number of policy questions that have arisen in recent years concerning the composition, role, and responsibilities of local community action agency tripartite boards. In addition, the Memorandum describes steps that may be taken by State CSBG lead agencies and State Community Action Associations to promote the continued viability and effectiveness of eligible entities through appropriately constituted and well-functioning tripartite boards.

***This Information Memorandum is not intended to be definitive or binding on State or local agencies, but to serve as a guide on key issues.***

**BACKGROUND:** Since 1968, local community action agencies have been required to have tripartite governing boards to gain and retain designation as eligible entities and to receive CSBG funding. Effective tripartite boards reflect and promote the unique anti-poverty leadership, action, and mobilization responsibilities assigned by law to community action agencies. Boards are responsible for assuring that agencies continue to assess and respond to the causes and conditions of poverty in their community, achieve anticipated family and community outcomes, and remain administratively and fiscally sound.

The nature of poverty and our nation's response to it continues to evolve. Many community action agencies are in the process of passing the baton to a new generation of leaders. This Information Memorandum restates and amplifies how tripartite boards help preserve community action focus, effectiveness, and accountability in these changing times.

## **Questions and Responses**

The following questions and OCS responses convey important information about the roles and responsibilities of tripartite boards as required by statute and suggestions on how State CSBG

authorities, State community action associations, and local agency officials can help assure that boards function effectively.

### **Question 1 - What does the law require?**

#### *Roles and Responsibilities of Tripartite Boards*

Sections 676B of the Community Services Block Grant Reauthorization Act of 1998 requires that, as a condition of designation, private nonprofit entities and public organizations administer their CSBG program through tripartite boards that "fully participate in the development, planning, implementation, and evaluation of the program to serve low-income communities."

#### *Board Composition*

##### •Low-Income Individuals and Families

For private nonprofit entities, a minimum of one-third of tripartite board membership must be democratically selected representatives of low-income individuals and families who reside in the geographic area being served by the agency.

For public organizations, such as city, county, or town governments, the law also requires that a minimum of one-third of tripartite board membership be comprised of representatives of low income individuals and families who reside in areas served. The statute allows public organizations to utilize State-specified mechanisms other than tripartite boards that "assure decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs..."

OCS does not recommend including in this community representation category for either public or private agency boards individuals who provide services or supports to low-income residents but who are neither low-income or residents of the agency's service area. Such individuals may qualify for board membership as representatives of another board category -- "major groups or interests in the community."

##### •Elected Officials or Their Representatives

One-third must be elected officials, holding office at their time of selection, or their representatives. If a sufficient number of elected officials or their representatives are not available to serve, appointive public officials or their representatives may take the place of elected officials.

##### •Major Groups and Interests in the Community Served

The remaining board members must be chosen from "business, industry, labor, religious, law enforcement, education, or other major groups and interests in the community served."

**Question 2 - Who appoints members to a tripartite board?**

The law states that members of tripartite boards "shall be selected by the entity" in accord with the conditions described above. States must assure that local agencies comply with Federal statute and any applicable State statutes, and that the bylaws of tripartite boards reflect and advance statutory requirements.

**Question 3 - Are term limits permissible?**

The CSBG statute is silent on term limits. However, many CAAs find term limits helpful to keep boards revitalized and current. Community action agencies may impose such limits through their own bylaws if they wish.

To achieve the purposes intended by statute for each of the three components of agency boards, State and local agencies are encouraged to consider the following term limit considerations:

*Representatives of Low-Income Individuals and Families*

The statute requires that representatives of low-income individuals and families be "chosen in accordance with democratic selection procedures." The implicit intent of this requirement is to insure that those who *currently* live in areas served by the agency are represented so that they have a strong voice in agency governance and direction and are able to convey to those they represent the presence and significance of community action in their lives. And, because some programs within community action agencies, especially Head Start, also require governance involving families being served, overall agency coordination and communications across programs are further enhanced when a few (one or two) members of Head Start Policy Councils serve on agency tripartite boards. The Head Start regulations require that the Policy Council and the Board cannot have *identical membership*, so this must be observed.

Every effort should be made by eligible entities to assure that board members representing low-income individuals and families:

- Have been selected on the basis of some form of democratic procedure either directly through election, public forum, or, if not possible, through a similar democratic process such as election to a position of responsibility in another significant service or community organization such as a school PTA, a faith-based organization leadership group; or an advisory board/governing council to another low-income service provider;

- Are truly representative of *current* residents of the geographic area to be served, including racial and ethnic composition, as determined by periodic selection or reselection by the community. Being *current* should be based on the recent or annual demographics changes as documented in the needs/ community assessment. This does not preclude extended service of low-income community representatives on boards, but does suggest that continued board participation of longer term members be revalidated from and kept current through some form of democratic process and the assessment of community changes. Ultimately, it is the responsibility of the State to assure that agencies uphold both the letter and intent of the law governing appointment of low-income community representatives to tripartite boards. Particular attention should be paid to the two conditions described above.

#### *Elected Public Officials or their Representatives*

The overarching purposes for having elected officials serve on tripartite boards are to encourage awareness of poverty needs within the community and action by local governments, and to foster close coordination and partnership between public agencies and the eligible entities. State CSBG lead agencies, State community action associations, and local agency officials should ensure that the nature and number of public officials serving on each agency board supports and promotes these goals. The statute requires that elected public officials must be "holding office on the date of selection" to a tripartite board. The statute does not identify which public officials ought to serve on the tripartite board. The statute allows public officials (elected, or if necessary, appointed) to name someone to represent them on the board. Again, while the statute does not set term limits for this category of board membership, the spirit of the law, that local governments participate in agency oversight and governance, suggests that:

- Elected officials serve on boards in this capacity only while they are in office.

Similarly, individuals designed by elected or appointed officials to represent them on boards serve only while their principals are in office or are re-designated by those in office. Agencies are responsible for making sure that this category of board membership remains current through such procedures as prompt notification of newly elected or currently elected public officials of the opportunity for board service or representation, and timely replacement of board members (or their representatives) who no longer hold public office.

Local agencies that wish to extend the board service of either formerly elected officials or their representatives may chose to appoint them as representatives of "major groups and interests in the community."

#### Representatives of Major Groups and Interests in the Community

While the statute does not set term limits for these board members, their role is to reflect and involve key interests and resources within the community to guide agency actions and outcomes. For this category, agencies should strive to assure that:

- Groups and interests with current influence or resources deemed critical to the success of the agency are represented.
- Members are empowered by their organizations to participate in board activities and play a role in agency outcomes.

#### **Question 4 - What does "fully participate in the development, planning, implementation, and evaluation of the program" mean?**

Tripartite boards are responsible for oversight and governance of community action agencies:

##### **Development**

As the designated anti-poverty-agencies within their community, both public and private eligible entities are required to conduct periodic needs assessments of the causes and conditions of poverty within their service area and to decide what role, or mission, the agency will assume relative to other community organizations and resources, in addressing those needs.

Tripartite boards are key players in the developmental processes described above:

- Needs Assessment -- Board members, especially those that live in communities to be served and that represent low-income people, ought to be a primary source of information and insight concerning the conditions in their neighborhoods. Representatives of low-income families can help fashion agency outreach and communication strategies, on an ongoing basis, to assure that agency staff and programs are responsive to changing community needs and conditions. Board members that represent elected officials, and other community groups and interests, all bring critical information and perspective to the needs assessment process. Elected officials or their representatives can commission or make available government-sponsored studies of local economic, social, educational, and key conditions that affect poverty. Business, labor, religious, and other community group representatives offer similar information from the private sector and access to short-term and longer-range service and resource assessments and/or development plans that may impact the nature or extent of poverty in the community.
- Clarifying Agency Mission -- The way each community action agency perceives its role, or mission, is central to what they do and how they assess their effectiveness. Tripartite boards, if correctly

constituted, provide an agency with a broadly-based, in-house, panel of "experts" on most aspects of community need, resources, and opportunities. Their expertise should help inform agency leadership and staff concerning the role(s) community action should and could play to reduce poverty vis-a.-vis other public and private programs and initiatives. Creating or reviewing mission statements can provide a focus for collaborative strategic planning among board members and agency leadership and staff, and a foundation for meaningful board oversight of agency operations and effectiveness.

## **Planning**

Tripartite boards are important participants in agency annual and longer-range planning activities. Specifically, individual members of the board, and the board as a whole, ought to contribute to, and benefit from, various aspects of program planning:

- Long-range Strategic Planning- For those CSBG entities that are 501(c)(3) non-profit agencies, tripartite boards are ultimately responsible for the overall direction, conduct, and effectiveness of agency programs and activities. Public agency boards are "advisory" and are intended to guide public officials that manage their agencies, both elected and appointed, with information and advice on how to reduce poverty within the geographic area being served. As such, participation of boards is essential in strategic planning discussions of how the mission of the agency is to be accomplished through its programs and activities, and how the agency will determine what constitutes its "success." Tripartite boards should be encouraged to help the agency: a) identify broad goals and results it hopes to achieve through its work among low-income individuals and families, and within the community being served; b) mobilize and array programs and activities, both within and outside the agency, to achieve those goals and results; and c) establish and maintain procedures for gathering and presenting information on goals and results for agency and board use.
- Annual Planning - Tripartite boards of both public and private entities should participate in the identification of what the agency hopes to accomplish each year and to help the agency establish specific performance expectations, in terms of both the nature and number of improvements to be achieved among low-income people and within the community, to guide agency programs and activities. Milestones, or intermediate steps toward achieving the ultimate results, ought to be identified by agency staff so that board members will be able to track progress throughout the year. In addition, boards are encouraged to identify possible ways to strengthen agency operations, including needed staff or facility enhancements, and to identify specific results it expects to be achieved. Boards may chose to utilize annual agency performance expectations, or anticipated program results, as important components of annual performance plans and compensation agreements they negotiate with the agency's executive director and other key staff.

## Implementation

Because members of tripartite boards have "fiduciary" responsibility for the overall operation of private, non-profit community action agencies and statutorily described "advisory" responsibilities in public agencies, members are expected to carry out their duties as any "reasonably prudent person" would do. At a minimum, CAPLAW suggests that this would require:

1. Regular attendance at board and committee meetings;
2. Thorough familiarity with core agency information, such as the agency's bylaws, articles of incorporation, sources of funding, agency goals and programs, Federal and State CSBG statutes;
3. Careful review of materials provided to board members;
4. Decision-making based on sufficient information;
5. Ensuring that proper fiscal systems and controls, as well as a legal compliance system, are in place; and
6. Knowledge of all major actions taken by the agency.

Two aspects of the requirements described by CAPLAW above warrant further discussion –board oversight of agency programs and board oversight of fiscal controls:

- Agency Program Implementation - Boards are encouraged to stay informed of agency programs and activities throughout the year, and to receive periodic reports from agency staff that focus on progress toward achieving milestones and ultimate results among clients and communities being served. Timely board awareness of program implementation progress allows for possible reassessment of performance expectations or program realignments should the need arise.

Board members are also encouraged to help the agency establish and maintain working relationships, or partnerships, with other public and private agencies and programs in the community that can help achieve community action results. For example:

1. Members that are either elected officials or that represent elected officials may identify public resources and programs that could contribute to client or community outcomes and facilitate communication and coordination between the community action agency and the public program;
2. Members that represent critical community interests, such as commercial or financial institutions, may help identify possible sources of support for the agency's low-income clients, including employment opportunities, asset formation assistance, or access to other financial services;
3. All members of the tripartite board may be enlisted in an agency's advocacy

efforts to increase or preserve needed services and programs in the community that support greater self-sufficiency among low-income families.

- Fiscal Controls - Because tripartite boards of private, non-profit agencies are ultimately

responsible for assuring that agency funds are spent and accounted for in accord with all applicable Federal, State, and local statutes and regulations, boards must make sure that fiscal controls and procedures are put in place and maintained by the agency that provide for:

1. Trained and qualified staff to manage fiscal accounts and records of the agency on a day-to-day basis;
2. Commonly accepted financial procedures for transactions, recordkeeping, and reporting such as those required by the CSBG Act, Part 74 of the Code of Federal Regulations, and OMB Circular 133;
3. Frequent reports to the board by agency fiscal staff on overall agency fiscal status, procedures, practices, and transactions;
4. Required board review and prior approval of all "substantial" agency fiscal transactions or commitments, as defined by statute or agency bylaws; and
5. Audits and audit reports to the board by a CPA firm independent of board member or agency staff association.

## **Evaluation**

As indicated, tripartite boards of both public and private agencies are encouraged to focus their attention on results in all phases of agency program activity, including program development, planning, implementation, and especially evaluation. Boards should request, and be provided with, information concerning actual changes or improvements that have occurred among clients and community as a result of agency assistance. To determine the relative "success" of the agency, its staff and programs, boards may compare the nature and level of these outcomes with performance expectations, or targets, which were developed during the agency's planning cycle.

Outcome or performance-focused information from one year can inform and strengthen program planning by the agency and its board in subsequent years.

## **Question 5 - What kind of training should board members receive?**

Board members need to be trained to carry out both the legal, or fiduciary, aspects of their service and their leadership responsibilities to help guide the agency toward "success."

At a minimum, it is recommended that board training cover the following topics:

• **Fiduciary Responsibilities**

1. Orientation to statutory and regulatory requirements (CSBG Act, other Federal, State or local statutes and regulations, including non-profit board requirements;
2. Agency articles of incorporation, bylaws, etc.
3. Overview of Board functioning - appointment, representation, meetings, committees, conflict of interest policy, relationship to executive director and staff, etc.
4. Role and Responsibilities of the Executive Director
5. Role and Responsibilities of the Board regarding the employment, retention, and compensation of the Executive Director and key agency staff
6. Overview of agency administration and financial management policies and procedures - oversight role and responsibilities of the board
7. Orientation to, and how to oversee, agency mission, long-range and annual plans
8. Orientation to, and how to oversee, agency programs and services
9. Orientation to, and how to oversee, agency evaluation and reporting policies and procedures - role of the board in program and personnel performance evaluation.

• **Agency Leadership - Board Roles and Responsibilities**

Results Oriented Management

1. Agency Development -
  - o Needs Assessment-
  - o Agency Mission determination -
2. Agency Planning
  - o Strategic Long-Range Planning
  - o Annual Planning - performance expectations and targets
  - o Forming Partnerships with other resources in the community
3. Program Implementation -
  - o Tracking of Milestones, interim performance results and reports
  - o Making mid-course corrections to improve performance

Results Oriented Accountability

4. Evaluation - (Results Oriented Accountability)
  - o Result-Focused Evaluation - clients and community
  - o Results-Focused Evaluation - agency and staff

- o Using Information for Planning
- o Using Information for Additional Funding and Advocacy

Note: In rural areas or where transportation is challenging, teleconference calls and other technological devices have assisted board communication.

Question 6 - What constitutes "conflicts of loyalty or interest" among board members and how best should they be avoided.

Individuals serve on tripartite boards first and foremost to advance the interests of the agency, its clients, and the community. They do not serve to advance their own interests and have a "duty of loyalty" to the agency. But, the very nature of the tripartite board, which calls for the representation of, and expected outreach to, various sectors of the community, creates possible situations in which distinctions of "loyalty" or "interest" need to be kept very clear and unambiguous.

To safeguard against situations in which the loyalty, interest, or intent, of board member action may be questionable, the following minimum conflict of interest practices are recommended:

- **Have a clear, written policy**

Each agency should have a clear, written policy concerning conflicts of loyalty or interest among board members and agency staff that describes in detail:

1. Full disclosure of financial interest requirements for all board members and staff;
2. Conditions and procedural requirements for board member and/or staff withdrawal from any action for which a real or potential conflict of interest might exist;
3. "Transparency" and full record keeping of all board or agency financial decisions or actions and the parties involved in the decisions or actions;
4. Policies and procedures for selective (i.e. meet a certain threshold of expenditure or financial commitment) "independent" prior review of actions or decisions that may pose potential conflict of interest issues.

- **Avoid situations that advantage board member interests or the appearance of advantage**

As indicated, the very nature of tripartite representation on boards creates potential conflict of loyalty or interest situations in which board members help the agency establish linkages with public and private community resources and services. Often, this outreach may result in financial arrangements or contracts involving expenditure of agency funds. In addition, board members have "inside" knowledge of agency activities and operations, including current and future employment

opportunities within the agency. To avoid situations in which a conflict of interest or loyalty would occur, or the appearance of such a conflict, the following is recommended:

1. Competitive bidding procedures should be used for large financial transaction situations in which a board member or agency staff member has an interest in, or relationship to, one or more providers of the needed goods or services. If such a potential is unclear, the agency and its board should refer the issue to a pre-identified "independent" conflict of interest consultant or group for a determination. For smaller transactions that may involve board or staff member interests, a process involving collection of comparable quotes, prices, or salaries may suffice.
2. If, after a competitive process, a provider with ties to a board member(s) or staff is selected to enter into a financial arrangement with the agency, the affected board member(s) and staff must disassociate themselves from participating in any decisions regarding the conduct of the financial relationship. Neither board member(s) nor staff may benefit personally, in any way, from the financial relationship between the agency and the provider with which they have a connection.
3. Board membership should not be used as a "stepping stone" to agency employment. Board members should not seek or receive employment from the agency in any part-time or full-time capacity during their service on the board. Board members wishing to be considered for employment ought to resign their position and wait a reasonable period of time before applying for a paid position within the agency. This waiting period is recommended to avoid both the actuality and appearance of undue advantage board membership affords in the hiring of agency management and staff.
4. Board members and their families should not enjoy any financial gain from their position, including receipt of salary, goods or special services for their board participation. Board members may be reimbursed for expenses associated with board service, such as incidental costs of supplies, or mileage, per diem, and lodging expenses incurred while attending out of town conferences or training approved by the entire board.
5. Agencies and boards should err on the side of caution in all matters that might create or appear to be a conflict of interest. They should use the proverbial "smell test" in all potentially questionable conflict of interest situations and call upon independent, outside counsel, both legal and ethical, to screen plans before action.

It should be noted that board members, especially those that represent low-income individuals or families, are not excluded from being clients of the agency and receiving program services for which

they are eligible. These board members should not receive preferential treatment in the nature or timing of such services.

Question 7- What is the best relationship between a tripartite board and the agency executive director?

The best relationship between a tripartite board and the agency executive director is one that advances the work of the agency in achieving results, or improvements, in the lives of low-income people and the community in which they live.

That said, there are organizational and functional issues that have prompted this question from a number of locations around the country over the past few years. While situations vary from agency to agency, and community to community, the following general principles are offered to promote strong, focused, and effective working relationships between tripartite boards and agency executive directors:

- **Boards Establish Policy, Executive Directors Execute Policy**

Tripartite boards are responsible for establishing and approving policies that govern all aspects of agency operations, including agency and board bylaws, administrative and fiscal control policies, and personnel policies. Executive directors are responsible to assuring that the board established policies are carried out by the agency, and for providing information to the board on the execution of its policies as requested by the board. In many agencies, boards work with the executive director and agency staff collaboratively to develop agency policies and procedures, but the ultimate responsibility for promulgating such policies remains with the board.

- **Boards Set Agency Mission, Executive Directors Accomplish Agency Mission**

Boards are responsible for determining the overall mission, or direction, of the agency taking into account the needs of the community and the relative anti-poverty role played by the agency vis-à-vis other programs and resources in the community. Executive directors are responsible for providing the necessary information and assistance to the board that will help them determine the overall mission or direction of the agency, and for organizing the agency's programs and services in such a way that will best accomplish the mission. Again, in many communities, boards and executive directors (and agency staff) work collaboratively to both set the agency's mission and organize programs and services toward that end.

- **Boards Set Performance Targets, Executive Directors Guide Work to Achieve Targets**

Ideally, tripartite boards will officially approve annual performance targets, or outcomes they expect the agency to achieve among low-income families and the community. In most cases, these performance targets will be in the form of recommendations from the agency's executive director developed ideally in concert with the board, agency staff, and key community partners. How the agency organizes and operates services and programs to achieve these board-approved performance targets is the responsibility of the executive director and the staff of the agency. Boards, therefore, should not routinely be involved in the day-to-day manner in which services are provided, but should pay particular attention to following the consequences, or results of agency programs as they unfold and are reported throughout the year.

- **Boards and Executive Directors Evaluate Agency Performance, Both are Accountable**

Based on reports of results generated by the agency, boards are ultimately responsible for deciding whether or not the agency and the executive director have been "successful" in accomplishing the mission of the agency. Boards are encouraged to focus on client and community results as a major factor in evaluating the work of the agency, its executive director, and staff. Indeed, such results may point to institutional needs, such as staff enhancement and training or program revisions, which may improve performance in subsequent years.

- **Boards Supervise Directly Only One Employee - the Executive Director**

One of the most important concepts conveyed by agencies that have well-functioning relationships between their tripartite board and executive director is, "Boards supervise directly only one employee - the Executive Director."

This concept embodies the notion that board and agency staff functions are indeed separate, but they are joined through the relationship between the board and the one person they must hold accountable for the work of everyone else -- the executive director. This clearly means the boards must hold the executive director responsible for the activities of the agency. The board should appraise the executive director's performance on an ongoing basis, but at a minimum, the board should have a complete appraisal annually. Adopting this concept of "one employee" enables boards to refrain from bypassing their agency's executive director to provide day-to-day instructions to agency staff (what many call "micromanaging"). But, it must be clear that the concept should not protect an executive director from gaining too much authority over all aspects of agency policy and operations by assuming roles and functions that clearly reside with the tripartite board.

The concept is not intended to diminish or distort the fiduciary responsibility of tripartite boards of private, non-profit agencies to oversee the overall functioning of their agency and the cumulative work of agency staff.

When a tripartite board is faced with the responsibility of recruiting and hiring a new executive director for their agency, members may set whatever criteria they deem appropriate. Boards are encouraged to seek out and employ a leader capable of:

1. Working cooperatively with the board to assure there is on-going consensus concerning the agency's antipoverty purpose, or mission, among board members, agency staff, and the broader community;
2. Mobilizing and coordinating programs and services both within and outside the agency toward accomplishing this mission;
3. Serving as a key community leader and advocate for the preservation and expansion of opportunities to assist low-income individuals and neighborhoods move out of poverty;
4. Achieving strong administration and fiscal control over agency resources; and
5. Employing performance-based management concepts embodied in Results Oriented Management and Accountability (ROMA) as the framework for relating to the board, and for all aspects of agency operations including program planning, resource allocation, service provision, program and staff evaluations.

**Question 8 - How can State CSBG agencies and State Community Action Associations advance the effectiveness of tripartite boards?**

At a minimum, OCS recommends that State CSBG agencies and State community action associations work together to assure that:

- **All board members receive timely and continuous training.**

OCS has funded the development of a number of board training curricula that are now available upon request and that contain many of the elements of effective training described in this Information Memorandum. For information on these training materials, please contact:

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- Board representatives participate actively in statewide community action training and technical assistance meetings and conferences.

Board chairs or other members ought to be encouraged to participate in statewide community action meetings and conferences sponsored by both the State CSBG authority and the State CAA association. Such meetings will not only provide an opportunity for board members to contribute to discussions and training, but will also provide a means of conveying to all board members the status of community action in the State, information about the programs, services, and accomplishments of other agencies, and how their boards can continue to help improve the focus and outcomes in their own agencies.

- State CSBG monitoring or CAA association assessments focus on board functioning (both fiduciary and leadership responsibilities)

State CSBG officials should meet routinely with boards as part of their overall monitoring of local agencies to determine the extent to which the boards are aware of, and are carrying out, their responsibilities. Assessment should be made of agency compliance with statutory requirements for board composition and functioning. Similar assessments are encouraged in those States in which CAA associations have developed and are using agency self-assessment procedures in conjunction with State CSBG monitoring. State CSBG authorities and State community action associations are encouraged to provide technical assistance to agencies to help them achieve or maintain compliance with the law.

Please don't hesitate to contact me if you have questions concerning this Information Memorandum.

\_\_\_\_\_/s/\_\_\_\_\_  
Margaret J. Washnitzer, DSW  
Director of State Assistance  
Office of Community Services

## NEWS RELEASES AND PUBLIC INFORMATION

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### 205 NEWS RELEASES AND PUBLIC INFORMATION

#### I. Purpose

It is to the Agency's advantage to circulate factual information about ALPI on an ongoing basis by providing news and information to the media in order to ensure items of interest are communicated to the public and ALPI remains in public view.

#### II. Policy

News Releases, Public Information Announcements and questions from media representatives of impact on the Agency's name, reputation, influence, facilities or other resources are to be directed to the Chief Executive Officer for direction and clearance to speak on the Agency's behalf.

News releases and media should be released from the Chief Executive Officer unless otherwise directed to the department level.

All local news and information which does not have Agency wide impact must be approved by the Department Director responsible for those activities, prior to release. This would include, but not be limited to sponsorship of local community events and on-going activities, recruitment of children, etc.

#### III. Procedure

It is of primary importance to protect the interests of ALPI by avoiding the danger of confusion, inconsistency and misinterpretation of facts and/or services.

##### A. Responsibility of Department Directors

Prepare all news releases and information to be released to the media and public. Other Agency representatives may release information to the media when previously authorized to do so.

##### B. Approval Agency-wide Information

Written or Verbal Statements

All written or verbal statements released to the media on behalf of ALPI must be authorized by the Chief Executive Officer prior to release. The Chief Executive Officer may assist in providing guidance to Agency representatives conducting interviews with the media.

# Head Start Program Performance Standards

45 CFR Chapter XIII  
RIN 0970-AC63

Department of Health and Human Services  
Administration for Children and Families



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# Subchapter B — The Administration for Children and Families, Head Start Program

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## Part 1301 — Program Governance

Sec.

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1301.2 Governing body.

1301.3 Policy council and policy committee.

1301.4 Parent committees.

1301.5 Training.

1301.6 Impasse procedures.

AUTHORITY: 42 U.S.C. 9801 *et seq.*

### §1301.1 Purpose.

An agency, as defined in part 1305 of this chapter, must establish and maintain a formal structure for program governance that includes a governing body, a policy council at the agency level and policy committee at the delegate level, and a parent committee. Governing bodies have a legal and fiscal responsibility to administer and oversee the agency's Head Start and Early Head Start programs. Policy councils are responsible for the direction of the agency's Head Start and Early Head Start programs.

### §1301.2 Governing body.

(a) Composition. The composition of a governing body must be in accordance with the requirements specified at section 642(c)(1)(B) of the Act, except where specific exceptions are authorized in the case of public entities at section 642(c)(1)(D) of the Act. Agencies must ensure members of the governing body do not have a conflict of interest, pursuant to section 642(c)(1)(C) of the Act.

(b) Duties and responsibilities.

(1) The governing body is responsible for activities specified at section 642(c)(1)(E) of the Act.

(2) The governing body must use ongoing monitoring results, data on school readiness goals,

other information described in §1302.102, and information described at section 642(d)(2) of the Act to conduct its responsibilities.

(c) Advisory committees.

- (1) A governing body may establish advisory committees as it deems necessary for effective governance and improvement of the program.
- (2) If a governing body establishes an advisory committee to oversee key responsibilities related to program governance, it must:
  - (i) Establish the structure, communication, and oversight in such a way that the governing body continues to maintain its legal and fiscal responsibility for the Head Start agency; and,
  - (ii) Notify the responsible HHS official of its intent to establish such an advisory committee.

### **§1301.3 Policy council and policy committee.**

(a) Establishing policy councils and policy committees. Each agency must establish and maintain a policy council responsible for the direction of the Head Start program at the agency level, and a policy committee at the delegate level. If an agency delegates operational responsibility for the entire Head Start or Early Head Start program to one delegate agency, the policy council and policy committee may be the same body.

(b) Composition.

- (1) A program must establish a policy council in accordance with section 642(c)(2)(B) of the Act, or a policy committee at the delegate level in accordance with section 642(c)(3) of the Act, as early in the program year as possible. Parents of children currently enrolled in each program option must be proportionately represented on the policy council and on the policy committee at the delegate level.
- (2) The program must ensure members of the policy council, and of the policy committee at the delegate level, do not have a conflict of interest pursuant to sections 642(c)(2)(C) and 642(c)(3)(B) of the Act. Staff may not serve on the policy council or policy committee at the delegate level except parents who occasionally substitute as staff. In the case of tribal grantees, this exclusion applies only to tribal staff who work in areas directly related to or which directly impact administrative, fiscal, or programmatic issues.

(c) Duties and responsibilities.

- (1) A policy council is responsible for activities specified at section 642(c)(2)(D) of the Act. A policy committee must approve and submit to the delegate agency its decisions in each of the following areas referenced at section 642(c)(2)(D)(i) through (vii) of the Act.
- (2) A policy council, and a policy committee at the delegate level, must use ongoing monitoring results, data on school readiness goals, other information described in §1302.102, and information described in section 642(d)(2) of the Act to conduct its responsibilities.

(d) Term.

- (1) A member will serve for one year.
- (2) If the member intends to serve for another year, s/he must stand for re-election.
- (3) The policy council, and policy committee at the delegate level, must include in its bylaws how many one-year terms, not to exceed five terms, a person may serve.
- (4) A program must seat a successor policy council, or policy committee at the delegate level, before an existing policy council, or policy committee at the delegate level, may be dissolved.

(e) Reimbursement. A program must enable low-income members to participate fully in their policy council or policy committee responsibilities by providing, if necessary, reimbursements for reasonable expenses incurred by the low-income members.

### **§1301.4 Parent committees.**

(a) Establishing parent committees. A program must establish a parent committee comprised exclusively of parents of currently enrolled children as early in the program year as possible. This committee must be established at the center level for center-based programs and at the local program level for other program options. When a program operates more than one option, parents may choose to have a separate committee for each option or combine membership. A program must ensure that parents of currently enrolled children understand the process for elections to the policy council or policy committee and other leadership opportunities.

(b) Requirements of parent committees. Within the parent committee structure, a program may determine the best methods to engage families using strategies that are most effective in their community, as long as the program ensures the parent committee carries out the following minimum responsibilities:

- (1) Advise staff in developing and implementing local program policies, activities, and services to ensure they meet the needs of children and families;
- (2) Have a process for communication with the policy council and policy committee; and
- (3) Within the guidelines established by the governing body, policy council or policy committee, participate in the recruitment and screening of Early Head Start and Head Start employees.

### **§1301.5 Training.**

An agency must provide appropriate training and technical assistance or orientation to the governing body, any advisory committee members, and the policy council, including training on program performance standards and training indicated in §1302.12(m) to ensure the members understand the information they receive and can effectively oversee and participate in the programs in the Head Start agency.

**§1301.6 Impasse procedures.**

(a) To facilitate meaningful consultation and collaboration about decisions of the governing body and the policy council, each agency's governing body and policy council jointly must establish written procedures for resolving internal disputes between the governing board and policy council in a timely manner that include impasse procedures. These procedures must:

- (1) Demonstrate that the governing body considers proposed decisions from the policy council and that the policy council considers proposed decisions from the governing body;
- (2) If there is a disagreement, require the governing body and the policy council to notify the other in writing why it does not accept a decision; and,
- (3) Describe a decision-making process and a timeline to resolve disputes and reach decisions that are not arbitrary, capricious, or illegal.

(b) If the agency's decision-making process does not result in a resolution and an impasse continues, the governing body and policy council must select a mutually agreeable third party mediator and participate in a formal process of mediation that leads to a resolution of the dispute.

(c) For all programs except American Indian and Alaska Native programs, if no resolution is reached with a mediator, the governing body and policy council must select a mutually agreeable arbitrator whose decision is final.

## **Part 1302 — Program Operations**

Sec.

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- 1302.42 Child health status and care.
- 1302.43 Oral health practices.
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- 1302.45 Child mental health and social and emotional well-being.
- 1302.46 Family support services for health, nutrition, and mental health.
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### **Subpart E — Family and Community Engagement Program Services**

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- 1302.51 Parent activities to promote child learning and development.
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- 1302.53 Community partnerships and coordination with other early childhood and education programs.

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- 1302.63 Coordination and collaboration with the local agency responsible for implementing IDEA.

### **Subpart G — Transition Services**

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- 1302.71 Transitions from Head Start to kindergarten.
- 1302.72 Transitions between programs.

### **Subpart H — Services to Enrolled Pregnant Women**

- 1302.80 Enrolled pregnant women.
- 1302.81 Prenatal and postpartum information, education, and services.
- 1302.82 Family partnership services for enrolled pregnant women.

### **Subpart I — Human Resources Management**

- 1302.90 Personnel policies.
- 1302.91 Staff qualification and competency requirements.
- 1302.92 Training and professional development.
- 1302.93 Staff health and wellness.

1302.94 Volunteers.

## **Subpart J — Program Management and Quality Improvement**

1302.100 Purpose.

1302.101 Management system.

1302.102 Achieving program goals.

1302.103 Implementation of program performance standards.

AUTHORITY: 42 U.S.C. 9801 *et seq.*

### **§1302.I Overview.**

This part implements these statutory requirements in Sections 641A, 645, 645A, and 648A of the Act by describing all of the program performance standards that are required to operate Head Start, Early Head Start, American Indian and Alaska Native and Migrant or Seasonal Head Start programs. The part covers the full range of operations from enrolling eligible children and providing program services to those children and their families, to managing programs to ensure staff are qualified and supported to effectively provide services. This part also focuses on using data through ongoing program improvement to ensure high-quality service. As required in the Act, these provisions do not narrow the scope or quality of services covered in previous regulations. Instead, these regulations raise the quality standard to reflect science and best practices, and streamline and simplify requirements so programs can better understand what is required for quality services.

## **Subpart A — Eligibility, Recruitment, Selection, Enrollment, and Attendance**

### **§1302.I0 Purpose.**

This subpart describes requirements of grantees for determining community strengths, needs and resources as well as recruitment areas. It contains requirements and procedures for the eligibility determination, recruitment, selection, enrollment and attendance of children and explains the policy concerning the charging of fees.

### **§1302.I1 Determining community strengths, needs, and resources.**

(a) Service area.

(1) A program must propose a service area in the grant application and define the area by county or sub-county area, such as a municipality, town or census tract or jurisdiction of a federally recognized Indian reservation.

(i) A tribal program may propose a service area that includes areas where members of Indian tribes or those eligible for such membership reside, including but not limited to Indian reservation land, areas designated as near-reservation by the Bureau of Indian Affairs (BIA) provided that the service area is approved by the tribe's governing council, Alaska Native Villages, Alaska Native Regional Corporations with land-based authorities,

Oklahoma Tribal Statistical Areas, and Tribal Designated Statistical Areas where federally recognized Indian tribes do not have a federally established reservation.

(ii) If the tribe's service area includes any area specified in paragraph (a)(1)(i) of this section, and that area is also served by another program, the tribe may serve children from families who are members of or eligible to be members of such tribe and who reside in such areas as well as children from families who are not members of the tribe, but who reside within the tribe's established service area.

(2) If a program decides to change the service area after ACF has approved its grant application, the program must submit to ACF a new service area proposal for approval.

(b) Community wide strategic planning and needs assessment (community assessment).

(1) To design a program that meets community needs, and builds on strengths and resources, a program must conduct a community assessment at least once over the five-year grant period. The community assessment must use data that describes community strengths, needs, and resources and include, at a **minimum**:

(i) The number of eligible infants, toddlers, preschool age children, and expectant mothers, including their geographic location, race, ethnicity, and languages they speak, including:

(A) Children experiencing homelessness in collaboration with, to the extent possible, McKinney-Vento Local Education Agency Liaisons (42 U.S.C. 11432 (6)(A));

(B) Children in foster care; and

(C) Children with disabilities, including types of disabilities and relevant services and resources provided to these children by community agencies;

(ii) The education, health, nutrition and social service needs of eligible children and their families, including prevalent social or economic factors that impact their well-being;

(iii) Typical work, school, and training schedules of parents with eligible children;

(iv) Other child development, child care centers, and family child care programs that serve eligible children, including home visiting, publicly funded state and local pre-schools, and the approximate number of eligible children served;

(v) Resources that are available in the community to address the needs of eligible children and their families; and,

(vi) Strengths of the community.

(2) A program must annually review and update the community assessment to reflect any significant changes including increased availability of publicly-funded pre-kindergarten (including an assessment of how the pre-kindergarten available in the community meets the needs of the parents and children served by the program, and whether it is offered for a full school day), rates of family and child homelessness, and significant shifts in community demographics and resources.

(3) A program must consider whether the characteristics of the community allow it to include children from diverse economic backgrounds that would be supported by other funding sources, including private pay, in addition to the program's eligible funded enrollment. A program must not enroll children from diverse economic backgrounds if it would result in a program serving less than its eligible funded enrollment.

## **§1302.12 Determining, verifying, and documenting eligibility.**

### **(a) Process overview.**

(1) Program staff must:

- (i) Conduct an in-person interview with each family, unless paragraph (a)(2) of this section applies;
- (ii) Verify information as required in paragraphs (h) and (i) of this section; and,
- (iii) Create an eligibility determination record for enrolled participants according to paragraph (k) of this section.

(2) Program staff may interview the family over the telephone if an in-person interview is not possible or convenient for the family.

(3) If a program has an alternate method to reasonably determine eligibility based on its community assessment, geographic and administrative data, or from other reliable data sources, it may petition the responsible HHS official to waive requirements in paragraphs (a)(1)(i) and (ii) of this section.

### **(b) Age requirements.**

(1) For Early Head Start, except when the child is transitioning to Head Start, a child must be an infant or a toddler younger than three years old.

(2) For Head Start, a child must:

- (i) Be at least three years old or, turn three years old by the date used to determine eligibility for public school in the community in which the Head Start program is located; and,
- (ii) Be no older than the age required to attend school.

(3) For Migrant or Seasonal Head Start, a child must be younger than compulsory school age by the date used to determine public school eligibility for the community in which the program is located.

### **(c) Eligibility requirements.**

(1) A pregnant woman or a child is eligible if:

- (i) The family's income is equal to or below the poverty line; or,

- (ii) The family is eligible for or, in the absence of child care, would be potentially eligible for public assistance; including TANF child-only payments; or,
- (iii) The child is homeless, as defined in part 1305; or,
- (iv) The child is in foster care.

(2) If the family does not meet a criterion under paragraph (c)(1) of this section, a program may enroll a child who would benefit from services, provided that these participants only make up to 10 percent of a program's enrollment in accordance with paragraph (d) of this section.

(d) Additional allowances for programs.

(1) A program may enroll an additional 35 percent of participants whose families do not meet a criterion described in paragraph (c) of this section and whose incomes are below 130 percent of the poverty line, if the program:

- (i) Establishes and implements outreach, and enrollment policies and procedures to ensure it is meeting the needs of eligible pregnant women, children, and children with disabilities, before serving pregnant women or children who do not meet the criteria in paragraph (c) of this section; and,
- (ii) Establishes criteria that ensure pregnant women and children eligible under the criteria listed in paragraph (c) of this section are served first.

(2) If a program chooses to enroll participants who do not meet a criterion in paragraph (c) of this section, and whose family incomes are between 100 and 130 percent of the poverty line, it must be able to report to the Head Start regional program office:

- (i) How it is meeting the needs of low-income families or families potentially eligible for public assistance, homeless children, and children in foster care, and include local demographic data on these populations;
- (ii) Outreach and enrollment policies and procedures that ensure it is meeting the needs of eligible children or pregnant women, before serving over-income children or pregnant women;
- (iii) Efforts, including outreach, to be fully enrolled with eligible pregnant women or children;
- (iv) Policies, procedures, and selection criteria it uses to serve eligible children;
- (v) Its current enrollment and its enrollment for the previous year;
- (vi) The number of pregnant women and children served, disaggregated by the eligibility criteria in paragraphs (c) and (d)(1) of this section; and,
- (vii) The eligibility criteria category of each child on the program's waiting list.

(e) Additional allowances for Indian tribes.

(1) Notwithstanding paragraph (c)(2) of this section, a tribal program may fill more than 10

percent of its enrollment with participants who are not eligible under the criteria in paragraph (c) of this section, if:

- (i) The tribal program has served all eligible pregnant women or children who wish to be enrolled from Indian and non-Indian families living within the approved service area of the tribal agency;
- (ii) The tribe has resources within its grant, without using additional funds from HHS intended to expand Early Head Start or Head Start services, to enroll pregnant women or children whose family incomes exceed low-income guidelines or who are not otherwise eligible; and,
- (iii) At least 51 percent of the program's participants meet an eligibility criterion under paragraph (c)(1) of this section.

(2) If another program does not serve the approved service area, the program must serve all eligible Indian and non-Indian pregnant women or children who wish to enroll before serving over-income pregnant women or children.

(3) A program that meets the conditions of this paragraph (e) must annually set criteria that are approved by the policy council and the tribal council for selecting over-income pregnant women or children who would benefit from program services.

(4) An Indian tribe or tribes that operates both an Early Head Start program and a Head Start program may, at its discretion, at any time during the grant period involved, reallocate funds between the Early Head Start program and the Head Start program in order to address fluctuations in client populations, including pregnant women and children from birth to compulsory school age. The reallocation of such funds between programs by an Indian tribe or tribes during a year may not serve as a basis for any reduction of the base grant for either program in succeeding years.

(f) Migrant or Seasonal eligibility requirements. A child is eligible for Migrant or Seasonal Head Start, if the family meets an eligibility criterion in paragraphs (c) and (d) of this section; and the family's income comes primarily from agricultural work.

(g) Eligibility requirements for communities with 1,000 or fewer individuals.

(1) A program may establish its own criteria for eligibility provided that it meets the criteria outlined in section 645(a)(2) of the Act.

(2) No child residing in such community whose family is eligible under criteria described in paragraphs (c) through (f) of this section, may be denied an opportunity to participate in the program under the eligibility criteria established under this paragraph (g).

(h) Verifying age. Program staff must verify a child's age according to program policies and procedures. A program's policies and procedures cannot require families to provide documents that confirm a child's age, if doing so creates a barrier for the family to enroll the child.

(i) Verifying eligibility.

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- (1) To verify eligibility based on income, program staff must use tax forms, pay stubs, or other proof of income to determine the family income for the relevant time period.
- (i) If the family cannot provide tax forms, pay stubs, or other proof of income for the relevant time period, program staff may accept written statements from employers, including individuals who are self-employed, for the relevant time period and use information provided to calculate total annual income with appropriate multipliers.
  - (ii) If the family reports no income for the relevant time period, a program may accept the family's signed declaration to that effect, if program staff describes efforts made to verify the family's income, and explains how the family's total income was calculated or seeks information from third parties about the family's eligibility, if the family gives written consent. If a family gives consent to contact third parties, program staff must adhere to program safety and privacy policies and procedures and ensure the eligibility determination record adheres to paragraph (k)(2) of this section.
  - (iii) If the family can demonstrate a significant change in income for the relevant time period, program staff may consider current income circumstances.
- (2) To verify whether a family is eligible for, or in the absence of child care, would be potentially eligible for public assistance, the program must have documentation from either the state, local, or tribal public assistance agency that shows the family either receives public assistance or that shows the family is potentially eligible to receive public assistance.
- (3) To verify whether a family is homeless, a program may accept a written statement from a homeless services provider, school personnel, or other service agency attesting that the child is homeless or any other documentation that indicates homelessness, including documentation from a public or private agency, a declaration, information gathered on enrollment or application forms, or notes from an interview with staff to establish the child is homeless; or any other document that establishes homelessness.
- (i) If a family can provide one of the documents described in this paragraph (i)(3), program staff must describe efforts made to verify the accuracy of the information provided and state whether the family is eligible because they are homeless.
  - (ii) If a family cannot provide one of the documents described in this paragraph (i)(3) to prove the child is homeless, a program may accept the family's signed declaration to that effect, if, in a written statement, program staff describe the child's living situation that meets the definition of homeless in part 1305 of this chapter.
  - (iii) Program staff may seek information from third parties who have firsthand knowledge about a family's living situation, if the family gives written consent. If the family gives consent to contact third parties, program staff must adhere to program privacy policies and procedures and ensure the eligibility determination record adheres to paragraph (k) of this section.
- (4) To verify whether a child is in foster care, program staff must accept either a court order or other legal or government-issued document, a written statement from a government child welfare official that demonstrates the child is in foster care, or proof of a foster care payment.
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(j) Eligibility duration.

- (1) If a child is determined eligible under this section and is participating in a Head Start program, he or she will remain eligible through the end of the succeeding program year except that the Head Start program may choose not to enroll a child when there are compelling reasons for the child not to remain in Head Start, such as when there is a change in the child's family income and there is a child with a greater need for Head Start services.
- (2) Children who are enrolled in a program receiving funds under the authority of section 645A of the Act remain eligible while they participate in the program.
- (3) If a child moves from an Early Head Start program to a Head Start program, program staff must verify the family's eligibility again.
- (4) If a program operates both an Early Head Start and a Head Start program, and the parents wish to enroll their child who has been enrolled in the program's Early Head Start, the program must ensure, whenever possible, the child receives Head Start services until enrolled in school, provided the child is eligible.

(k) Records.

- (1) A program must keep eligibility determination records for each participant and ongoing records of the eligibility training for staff required by paragraph (m) of this section. A program may keep these records electronically.
- (2) Each eligibility determination record must include:
  - (i) Copies of any documents or statements, including declarations, that are deemed necessary to verify eligibility under paragraphs (h) and (i) of this section;
  - (ii) A statement that program staff has made reasonable efforts to verify information by:
    - (A) Conducting either an in-person, or a telephone interview with the family as described under paragraph (a)(1)(i) or (a)(2) of this section; and,
    - (B) Describing efforts made to verify eligibility, as required under paragraphs (h) through (i) of this section; and, collecting documents required for third party verification that includes the family's written consent to contact each third party, the third parties' names, titles, and affiliations, and information from third parties regarding the family's eligibility.
  - (iii) A statement that identifies whether:
    - (A) The family's income is below income guidelines for its size, and lists the family's size;
    - (B) The family is eligible for or, in the absence of child care, potentially eligible for public assistance;
    - (C) The child is a homeless child or the child is in foster care;

(D) The family was determined to be eligible under the criterion in paragraph (c)(2) of this section; or,

(E) The family was determined to be eligible under the criterion in paragraph (d)(1) of this section.

(3) A program must keep eligibility determination records for those currently enrolled, as long as they are enrolled, and, for one year after they have either stopped receiving services; or are no longer enrolled.

(l) Program policies and procedures on violating eligibility determination regulations. A program must establish written policies and procedures that describe all actions taken against staff who intentionally violate federal and program eligibility determination regulations and who enroll pregnant women and children that are not eligible to receive Early Head Start or Head Start services.

(m) Training on eligibility.

(1) A program must train all governing body, policy council, management, and staff who determine eligibility on applicable federal regulations and program policies and procedures. Training must, at a minimum:

(i) Include methods on how to collect complete and accurate eligibility information from families and third party sources;

(ii) Incorporate strategies for treating families with dignity and respect and for dealing with possible issues of domestic violence, stigma, and privacy; and,

(iii) Explain program policies and procedures that describe actions taken against staff, families, or participants who attempt to provide or intentionally provide false information.

(2) A program must train management and staff members who make eligibility determinations within 90 days of hiring new staff.

(3) A program must train all governing body and policy council members within 180 days of the beginning of the term of a new governing body or policy council.

(4) A program must develop policies on how often training will be provided after the initial training.

**§1302.13 Recruitment of children.**

In order to reach those most in need of services, a program must develop and implement a recruitment process designed to actively inform all families with eligible children within the recruitment area of the availability of program services, and encourage and assist them in applying for admission to the program. A program must include specific efforts to actively locate and recruit children with disabilities and other vulnerable children, including homeless children and children in foster care.

**§1302.14 Selection process.****(a) Selection criteria.**

(1) A program must annually establish selection criteria that weigh the prioritization of selection of participants, based on community needs identified in the community needs assessment as described in §1302.11(b), and including family income, whether the child is homeless, whether the child is in foster care, the child's age, whether the child is eligible for special education and related services, or early intervention services, as appropriate, as determined under the Individuals with Disabilities Education Act (IDEA) (20 U.S.C. 1400 *et seq.*) and, other relevant family or child risk factors.

(2) If a program serves migrant or seasonal families, it must select participants according to criteria in paragraph (a)(1) of this section, and give priority to children whose families can demonstrate they have relocated frequently within the past two-years to pursue agricultural work.

(3) If a program operates in a service area where Head Start eligible children can enroll in high-quality publicly funded pre-kindergarten for a full school day, the program must prioritize younger children as part of the selection criteria in paragraph (a)(1) of this section. If this priority would disrupt partnerships with local education agencies, then it is not required. An American Indian and Alaska Native or Migrant or Seasonal Head Start program must consider whether such prioritization is appropriate in their community.

(4) A program must not deny enrollment based on a disability or chronic health condition or its severity.

**(b) Children eligible for services under IDEA.**

(1) A program must ensure at least 10 percent of its total funded enrollment is filled by children eligible for services under IDEA, unless the responsible HHS official grants a waiver.

(2) If the requirement in paragraph (b)(1) of this section has been met, children eligible for services under IDEA should be prioritized for the available slots in accordance with the program's selection criteria described in paragraph (a) of this section.

(c) Waiting lists. A program must develop at the beginning of each enrollment year and maintain during the year a waiting list that ranks children according to the program's selection criteria.

**§1302.15 Enrollment.**

(a) Funded enrollment. A program must maintain its funded enrollment level and fill any vacancy as soon as possible. A program must fill any vacancy within 30 days.

**(b) Continuity of enrollment.**

(1) A program must make efforts to maintain enrollment of eligible children for the following year.

(2) Under exceptional circumstances, a program may maintain a child's enrollment in Head

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Start for a third year, provided that family income is verified again. A program may maintain a child's enrollment in Early Head Start as described in §1302.12(j)(2).

(3) If a program serves homeless children or children in foster care, it must make efforts to maintain the child's enrollment regardless of whether the family or child moves to a different service area, or transition the child to a program in a different service area, as required in §1302.72(a), according to the family's needs.

(c) Reserved slots. If a program determines from the community assessment there are families experiencing homelessness in the area, or children in foster care that could benefit from services, the program may reserve one or more enrollment slots for pregnant women and children experiencing homelessness and children in foster care, when a vacancy occurs. No more than three percent of a program's funded enrollment slots may be reserved. If the reserved enrollment slot is not filled within 30 days, the enrollment slot becomes vacant and then must be filled in accordance with paragraph (a) of this section.

(d) Other enrollment. Children from diverse economic backgrounds who are funded with other sources, including private pay, are not considered part of a program's eligible funded enrollment.

(e) State immunization enrollment requirements. A program must comply with state immunization enrollment and attendance requirements, with the exception of homeless children as described in §1302.16(c)(1).

(f) Voluntary parent participation. Parent participation in any program activity is voluntary, including consent for data sharing, and is not required as a condition of the child's enrollment.

## **§1302.16 Attendance.**

(a) Promoting regular attendance. A program must track attendance for each child.

(1) A program must implement a process to ensure children are safe when they do not arrive at school. If a child is unexpectedly absent and a parent has not contacted the program within one hour of program start time, the program must attempt to contact the parent to ensure the child's well-being.

(2) A program must implement strategies to promote attendance. At a minimum, a program must:

- (i) Provide information about the benefits of regular attendance;
- (ii) Support families to promote the child's regular attendance;
- (iii) Conduct a home visit or make other direct contact with a child's parents if a child has multiple unexplained absences (such as two consecutive unexplained absences); and,
- (iv) Within the first 60 days of program operation, and on an ongoing basis thereafter, use individual child attendance data to identify children with patterns of absence that put them at risk of missing ten percent of program days per year and develop appropriate strategies to improve individual attendance among identified children, such as direct contact with parents or intensive case management, as necessary.

(3) If a child ceases to attend, the program must make appropriate efforts to reengage the family to resume attendance, including as described in paragraph (a)(2) of this section. If the child's attendance does not resume, then the program must consider that slot vacant. This action is not considered expulsion as described in §1302.17.

(b) Managing systematic program attendance issues. If a program's monthly average daily attendance rate falls below 85 percent, the program must analyze the causes of absenteeism to identify any systematic issues that contribute to the program's absentee rate. The program must use this data to make necessary changes in a timely manner as part of ongoing oversight and correction as described in §1302.102(b) and inform its continuous improvement efforts as described in §1302.102(c).

(c) Supporting attendance of homeless children.

(1) If a program determines a child is eligible under §1302.12(c)(1)(iii), it must allow the child to attend for up to 90 days or as long as allowed under state licensing requirements, without immunization and other records, to give the family reasonable time to present these documents. A program must work with families to get children immunized as soon as possible in order to comply with state licensing requirements.

(2) If a child experiencing homelessness is unable to attend classes regularly because the family does not have transportation to and from the program facility, the program must utilize community resources, where possible, to provide transportation for the child.

## **§1302.17 Suspension and expulsion.**

(a) Limitations on suspension.

(1) A program must prohibit or severely limit the use of suspension due to a child's behavior. Such suspensions may only be temporary in nature.

(2) A temporary suspension must be used only as a last resort in extraordinary circumstances where there is a serious safety threat that cannot be reduced or eliminated by the provision of reasonable modifications.

(3) Before a program determines whether a temporary suspension is necessary, a program must engage with a mental health consultant, collaborate with the parents, and utilize appropriate community resources – such as behavior coaches, psychologists, other appropriate specialists, or other resources – as needed, to determine no other reasonable option is appropriate.

(4) If a temporary suspension is deemed necessary, a program must help the child return to full participation in all program activities as quickly as possible while ensuring child safety by:

- (i) Continuing to engage with the parents and a mental health consultant, and continuing to utilize appropriate community resources;
- (ii) Developing a written plan to document the action and supports needed;
- (iii) Providing services that include home visits; and,

(iv) Determining whether a referral to a local agency responsible for implementing IDEA is appropriate.

(b) Prohibition on expulsion.

(1) A program cannot expel or unenroll a child from Head Start because of a child's behavior.

(2) When a child exhibits persistent and serious challenging behaviors, a program must explore all possible steps and document all steps taken to address such problems, and facilitate the child's safe participation in the program. Such steps must include, at a minimum, engaging a mental health consultant, considering the appropriateness of providing appropriate services and supports under section 504 of the Rehabilitation Act to ensure that the child who satisfies the definition of disability in 29 U.S.C. 705(9)(b) of the Rehabilitation Act is not excluded from the program on the basis of disability, and consulting with the parents and the child's teacher, and:

(i) If the child has an individualized family service plan (IFSP) or individualized education program (IEP), the program must consult with the agency responsible for the IFSP or IEP to ensure the child receives the needed support services; or,

(ii) If the child does not have an IFSP or IEP, the program must collaborate, with parental consent, with the local agency responsible for implementing IDEA to determine the child's eligibility for services.

(3) If, after a program has explored all possible steps and documented all steps taken as described in paragraph (b)(2) of this section, a program, in consultation with the parents, the child's teacher, the agency responsible for implementing IDEA (if applicable), and the mental health consultant, determines that the child's continued enrollment presents a continued serious safety threat to the child or other enrolled children and determines the program is not the most appropriate placement for the child, the program must work with such entities to directly facilitate the transition of the child to a more appropriate placement.

## §1302.18 Fees.

(a) Policy on fees. A program must not charge eligible families a fee to participate in Head Start, including special events such as field trips, and cannot in any way condition an eligible child's enrollment or participation in the program upon the payment of a fee.

(b) Allowable fees.

(1) A program must only accept a fee from families of enrolled children for services that are in addition to services funded by Head Start, such as child care before or after funded Head Start hours. A program may not condition a Head Start child's enrollment on the ability to pay a fee for additional hours.

(2) In order to support programs serving children from diverse economic backgrounds or using multiple funding sources, a program may charge fees to private pay families and other non-Head Start enrolled families to the extent allowed by any other applicable federal, state or local funding sources.

## Subpart B — Program Structure

### §1302.20 Determining program structure.

(a) Choose a program option.

(1) A program must choose to operate one or more of the following program options: center-based, home-based, family child care, or an approved locally-designed variation as described in §1302.24. The program option(s) chosen must meet the needs of children and families based on the community assessment described in §1302.11(b). A Head Start program serving preschool-aged children may not provide only the option described in §1302.22(a) and (c)(2).

(2) To choose a program option and develop a program calendar, a program must consider in conjunction with the annual review of the community assessment described in §1302.11(b) (2), whether it would better meet child and family needs through conversion of existing slots to full school day or full working day slots, extending the program year, conversion of existing Head Start slots to Early Head Start slots as described in paragraph (c) of this section, and ways to promote continuity of care and services. A program must work to identify alternate sources to support full working day services. If no additional funding is available, program resources may be used.

(b) Comprehensive services. All program options must deliver the full range of services, as described in subparts C, D, E, F, and G of this part, except that §§1302.30 through 1302.32 and §1302.34 do not apply to home-based options.

(c) Conversion.

(1) Consistent with section 645(a)(5) of the Head Start Act, grantees may request to convert Head Start slots to Early Head Start slots through the re-funding application process or as a separate grant amendment.

(2) Any grantee proposing a conversion of Head Start services to Early Head Start services must obtain policy council and governing body approval and submit the request to their regional office.

(3) With the exception of American Indian and Alaska Native grantees as described in paragraph (c)(4) of this section, the request to the regional office must include:

(i) A grant application budget and a budget narrative that clearly identifies the funding amount for the Head Start and Early Head Start programs before and after the proposed conversion;

(ii) The results of the community assessment demonstrating how the proposed use of funds would best meet the needs of the community, including a description of how the needs of eligible Head Start children will be met in the community when the conversion takes places;

(iii) A revised program schedule that describes the program option(s) and the number of funded enrollment slots for Head Start and Early Head Start programs before and after the proposed conversion;

(iv) A description of how the needs of pregnant women, infants, and toddlers will be addressed;

(v) A discussion of the agency's capacity to carry out an effective Early Head Start program in accordance with the requirements of section 645A(b) of the Head Start Act and all applicable regulations;

(vi) Assurances that the agency will participate in training and technical assistance activities required of all Early Head Start grantees;

(vii) A discussion of the qualifications and competencies of the child development staff proposed for the Early Head Start program, as well as a description of the facilities and program infrastructure that will be used to support the new or expanded Early Head Start program;

(viii) A discussion of any one-time funding necessary to implement the proposed conversion and how the agency intends to secure such funding; and,

(ix) The proposed timetable for implementing this conversion, including updating school readiness goals as described in subpart J of this part.

(4) Consistent with section 645(d)(3) of the Act, any American Indian and Alaska Native grantee that operates both an Early Head Start program and a Head Start program may reallocate funds between the programs at its discretion and at any time during the grant period involved, in order to address fluctuations in client populations. An American Indian and Alaska Native program that exercises this discretion must notify the regional office.

(d) Source of funding. A program may consider hours of service that meet the Head Start Program Performance Standards, regardless of the source of funding, as hours of planned class operations for the purposes of meeting the Head Start and Early Head Start service duration requirements in this subpart.

## **§1302.21 Center-based option.**

(a) Setting. The center-based option delivers the full range of services, consistent with §1302.20(b). Education and child development services are delivered primarily in classroom settings.

(b) Ratios and group size.

(1) Staff-child ratios and group size maximums must be determined by the age of the majority of children and the needs of children present. A program must determine the age of the majority of children in a class at the start of the year and may adjust this determination during the program year, if necessary. Where state or local licensing requirements are more stringent than the teacher-child ratios and group size specifications in this section, a program must meet

the stricter requirements. A program must maintain appropriate ratios during all hours of program operation, except:

- (i) For brief absences of a teaching staff member for no more than five minutes; and,
  - (ii) During nap time, one teaching staff member may be replaced by one staff member or trained volunteer who does not meet the teaching qualifications required for the age.
- (2) An Early Head Start or Migrant or Seasonal Head Start class that serves children under 36 months old must have two teachers with no more than eight children, or three teachers with no more than nine children. Each teacher must be assigned consistent, primary responsibility for no more than four children to promote continuity of care for individual children. A program must minimize teacher changes throughout a child’s enrollment, whenever possible, and consider mixed age group classes to support continuity of care.
- (3) A class that serves a majority of children who are three years old must have no more than 17 children with a teacher and teaching assistant or two teachers. A double session class that serves a majority of children who are three years old must have no more than 15 children with a teacher and teaching assistant or two teachers.
- (4) A class that serves a majority of children who are four and five years old must have no more than 20 children with a teacher and a teaching assistant or two teachers. A double session class that serves a majority of children who are four and five years old must have no more than 17 children with a teacher and a teaching assistant or two teachers.

**Table to §1302.21(b) — Center-based group size**

<b>4 and 5 year olds</b>	No more than 20 children enrolled in any class. No more than 17 children enrolled in any double session class.
<b>3 year olds</b>	No more than 17 children enrolled in any class No more than 15 children enrolled in any double session class.
<b>Under 3 years old</b>	No more than 8 or 9 children enrolled in any class, depending on the number of teachers.

(c) Service duration.

(1) Early Head Start.

- (i) By August 1, 2018, a program must provide 1,380 annual hours of planned class operations for all enrolled children.
- (ii) A program that is designed to meet the needs of young parents enrolled in school settings may meet the service duration requirements in paragraph (c)(1)(i) of this section if it operates a center-based program schedule during the school year aligned with its local education agency requirements and provides regular home-based services during the summer break.

(2) Head Start.

- (i) Until a program is operating all of its Head Start center-based funded enrollment

at the standard described in paragraph (c)(2)(iv) or (v) of this section, a program must provide, at a minimum, at least 160 days per year of planned class operations if it operates for five days per week, or at least 128 days per year if it operates four days per week. Classes must operate for a minimum of 3.5 hours per day.

(ii) Until a program is operating all of its Head Start center-based funded enrollment at the standard described in paragraph (c)(2)(iv) or (v) of this section, if a program operates a double session variation, it must provide classes for four days per week for a minimum of 128 days per year and 3.5 hours per day. Each double session class staff member must be provided adequate break time during the course of the day. In addition, teachers, aides, and volunteers must have appropriate time to prepare for each session together, to set up the classroom environment, and to give individual attention to children entering and leaving the center.

(iii) By August 1, 2019, a program must provide 1,020 annual hours of planned class operations over the course of at least eight months per year for at least 50 percent of its Head Start center-based funded enrollment.

(iv) By August 1, 2021, a program must provide 1,020 annual hours of planned class operations over the course of at least eight months per year for all of its Head Start center-based funded enrollment.

(v) A Head Start program providing fewer than 1,020 annual hours of planned class operations or fewer than eight months of service is considered to meet the requirements described in paragraphs (c)(2)(iii) and (iv) of this section if its program schedule aligns with the annual hours required by its local education agency for grade one and such alignment is necessary to support partnerships for service delivery.

(3) Secretarial determination.

(i) On or before February 1, 2018, the Secretary may lower the required percentage described in paragraph (c)(2)(iii) of this section, based on an assessment of the availability of sufficient funding to mitigate a substantial reduction in funded enrollment; and,

(ii) On or before February 1, 2020, the Secretary may lower the required percentage described in paragraph (c)(2)(iv) of this section, based on an assessment of the availability of sufficient funding to mitigate a substantial reduction in funded enrollment.

(4) Extension. If an extension is necessary to ensure children enrolled in the program on November 7, 2016 are not displaced from the Early Head Start or Head Start program, a program may request a one-year extension from the responsible HHS official of the requirements outlined in paragraphs (c)(1) and (c)(2)(iii) of this section.

(5) Exemption for Migrant or Seasonal Head Start programs. A Migrant or Seasonal program is not subject to the requirements described in §1302.21(c)(1) or (2), but must make every effort to provide as many days and hours of service as possible to each child and family.

(6) Calendar planning. A program must:

- (i) Plan its year using a reasonable estimate of the number of days during a year that classes may be closed due to problems such as inclement weather; and,
- (ii) Make every effort to schedule makeup days using existing resources if hours of planned class operations fall below the number required per year.

(d) Licensing and square footage requirements.

- (1) The facilities used by a program must meet state, tribal, or local licensing requirements, even if exempted by the licensing entity. When state, tribal, or local requirements vary from Head Start requirements, the most stringent provision takes precedence.
- (2) A center-based program must have at least 35 square feet of usable indoor space per child available for the care and use of children (exclusive of bathrooms, halls, kitchen, staff rooms, and storage places) and at least 75 square feet of usable outdoor play space per child.
- (3) A program that operates two or more groups within an area must ensure clearly defined, safe divisions to separate groups. A program must ensure such spaces are learning environments that facilitate the implementation of the requirements in subpart C of this part. The divisions must limit noise transfer from one group to another to prevent disruption of an effective learning environment.

**§1302.22 Home-based option.**

(a) Setting. The home-based option delivers the full range of services, consistent with §1302.20(b), through visits with the child's parents, primarily in the child's home and through group socialization opportunities in a Head Start classroom, community facility, home, or on field trips. For Early Head Start programs, the home-based option may be used to deliver services to some or all of a program's enrolled children. For Head Start programs, the home-based option may only be used to deliver services to a portion of a program's enrolled children.

(b) Caseload. A program that implements a home-based option must maintain an average caseload of 10 to 12 families per home visitor with a maximum of 12 families for any individual home visitor.

(c) Service duration.

(1) Early Head Start. By August 1, 2017, an Early Head Start home-based program must:

- (i) Provide one home visit per week per family that lasts at least an hour and a half and provide a **minimum** of 46 visits per year; and,
- (ii) Provide, at a **minimum**, 22 group socialization activities distributed over the course of the program year.

(2) Head Start. A Head Start home-based program must:

- (i) Provide one home visit per week per family that lasts at least an hour and a half and provide a **minimum** of 32 visits per year; and,

(ii) Provide, at a minimum, 16 group socialization activities distributed over the course of the program year.

(3) Meeting minimum requirements. A program that implements a home-based option must:

(i) Make up planned home visits or scheduled group socialization activities that were canceled by the program, and to the extent possible attempt to make up planned home visits canceled by the family, when this is necessary to meet the minimums described in paragraphs (c)(1) and (2) of this section; and,

(ii) Not replace home visits or scheduled group socialization activities for medical or social service appointments for the purposes of meeting the minimum requirements described in paragraphs (c)(1) and (2) of this section.

(d) Safety requirements. The areas for learning, playing, sleeping, toileting, preparing food, and eating in facilities used for group socializations in the home-based option must meet the safety standards described in §1302.47(1)(ii) through (viii).

**§1302.23 Family child care option.**

(a) Setting. The family child care program option delivers the full range of services, consistent with §1302.20(b). Education and child development services are primarily delivered by a family child care provider in their home or other family-like setting. A program may choose to offer the family child care option if:

(1) The program has a legally binding agreement with one or more family child care provider(s) that clearly defines the roles, rights, and responsibilities of each party, or the program is the employer of the family child care provider, and ensures children and families enrolled in this option receive the full range of services described in subparts C, D, E, F, and G of this part; and,

(2) The program ensures family child care homes are available that can accommodate children and families with disabilities.

(b) Ratios and group size.

(1) A program that operates the family child care option where Head Start children are enrolled must ensure group size does not exceed the limits specified in this section. If the family child care provider’s own children under the age of six are present, they must be included in the group size.

(2) When there is one family child care provider, the maximum group size is six children and no more than two of the six may be under 24 months of age. When there is a provider and an assistant, the maximum group size is twelve children with no more than four of the twelve children under 24 months of age.

(3) One family child care provider may care for up to four children younger than 36 months of age with a maximum group size of four children, and no more than two of the four children may be under 18 months of age.

(4) A program must maintain appropriate ratios during all hours of program operation. A program must ensure providers have systems to ensure the safety of any child not within view for any period. A program must make substitute staff and assistant providers available with the necessary training and experience to ensure quality services to children are not interrupted.

(c) Service duration. Whether family child care option services are provided directly or via contractual arrangement, a program must ensure family child care providers operate sufficient hours to meet the child care needs of families and not less than 1,380 hours per year.

(d) Licensing requirements. A family child-care provider must be licensed by the state, tribal, or local entity to provide services in their home or family-like setting. When state, tribal, or local requirements vary from Head Start requirements, the most stringent provision applies.

(e) Child development specialist. A program that offers the family child care option must provide a child development specialist to support family child care providers and ensure the provision of quality services at each family child care home. Child development specialists must:

- (1) Conduct regular visits to each home, some of which are unannounced, not less than once every two weeks;
- (2) Periodically verify compliance with either contract requirements or agency policy;
- (3) Facilitate ongoing communication between program staff, family child care providers, and enrolled families; and,
- (4) Provide recommendations for technical assistance and support the family child care provider in developing relationships with other child care professionals.

### **§1302.24 Locally-designed program option variations.**

(a) Waiver option. Programs may request to operate a locally-designed program option, including a combination of program options, to better meet the unique needs of their communities or to demonstrate or test alternative approaches for providing program services. In order to operate a locally-designed program option, programs must seek a waiver as described in this section and must deliver the full range of services, consistent with §1302.20(b), and demonstrate how any change to their program design is consistent with achieving program goals in subpart J of this part.

(b) Request for approval. A program's request to operate a locally-designed variation may be approved by the responsible HHS official through the end of a program's current grant or, if the request is submitted through a grant application for an upcoming project period, for the project period of the new award. Such approval may be revoked based on progress toward program goals as described in §1302.102 and monitoring as described in §1304.2.

(c) Waiver requirements.

- (1) The responsible HHS official may waive one or more of the requirements contained in §1302.21(b), (c)(1)(i), and (c)(2)(iii) and (iv); §1302.22(a) through (c); and §1302.23(b) and (c), but may not waive ratios or group size for children under 24 months. Center-based

locally-designed options must meet the minimums described in section 640(k)(1) of the Act for center-based programs.

(2) If the responsible HHS official determines a waiver of group size for center-based services would better meet the needs of children and families in a community, the group size may not exceed the limits below:

- (i) A group that serves children 24 to 36 months of age must have no more than ten children; and,
- (ii) A group that serves predominantly three-year-old children must have no more than twenty children; and,
- (iii) A group that serves predominantly four-year-old children must have no more than twenty-four children.

(3) If the responsible HHS official approves a waiver to allow a program to operate below the minimums described in §1302.21(c)(2)(iii) or (iv), a program must meet the requirements described in §1302.21(c)(2)(i), or in the case of a double session variation, a program must meet the requirements described in §1302.21(c)(2)(ii).

(4) In order to receive a waiver under this section, a program must provide supporting evidence that demonstrates the locally-designed variation effectively supports appropriate development and progress in children's early learning outcomes.

(5) In order to receive a waiver of service duration, a program must meet the requirement in paragraph (c)(4) of this section, provide supporting evidence that it better meets the needs of parents than the applicable service duration minimums described in §1302.21(c)(1), and (c)(2)(iii) and (iv), §1302.22(c), or §1302.23(c), and assess the effectiveness of the variation in supporting appropriate development and progress in children's early learning outcomes.

(d) Transition from previously approved program options. If, before November 7, 2016, a program was approved to operate a program option that is no longer allowable under §§1302.21 through 1302.23, a program may continue to operate that model until July 31, 2018.

## **Subpart C — Education and Child Development Program Services**

### **§1302.30 Purpose.**

All programs must provide high-quality early education and child development services, including for children with disabilities, that promote children's cognitive, social, and emotional growth for later success in school. A center-based or family child care program must embed responsive and effective teacher-child interactions. A home-based program must promote secure parent-child relationships and help parents provide high-quality early learning experiences. All programs must implement a research-based curriculum, and screening and assessment procedures that support individualization and growth in the areas of development described in the Head Start Early Learning Outcomes.

Framework: Ages Birth to Five and support family engagement in children’s learning and development. A program must deliver developmentally, culturally, and linguistically appropriate learning experiences in language, literacy, mathematics, social and emotional functioning, approaches to learning, science, physical skills, and creative arts. To deliver such high-quality early education and child development services, a center-based or family child care program must implement, at a minimum, the elements contained in §§1302.31 through 1302.34, and a home-based program must implement, at a minimum, the elements in §§1302.33 and 1302.35.

## **§1302.31 Teaching and the learning environment.**

(a) Teaching and the learning environment. A center-based and family child care program must ensure teachers and other relevant staff provide responsive care, effective teaching, and an organized learning environment that promotes healthy development and children’s skill growth aligned with the Head Start Early Learning Outcomes Framework: Ages Birth to Five, including for children with disabilities. A program must also support implementation of such environment with integration of regular and ongoing supervision and a system of individualized and ongoing professional development, as appropriate. This includes, at a minimum, the practices described in paragraphs (b) through (e) of this section.

(b) Effective teaching practices.

(1) Teaching practices must:

- (i) Emphasize nurturing and responsive practices, interactions, and environments that foster trust and emotional security; are communication and language rich; promote critical thinking and problem-solving; social, emotional, behavioral, and language development; provide supportive feedback for learning; motivate continued effort; and support all children’s engagement in learning experiences and activities;
- (ii) Focus on promoting growth in the developmental progressions described in the Head Start Early Learning Outcomes Framework: Ages Birth to Five by aligning with and using the Framework and the curricula as described in §1302.32 to direct planning of organized activities, schedules, lesson plans, and the implementation of high-quality early learning experiences that are responsive to and build upon each child’s individual pattern of development and learning;
- (iii) Integrate child assessment data in individual and group planning; and,
- (iv) Include developmentally appropriate learning experiences in language, literacy, social and emotional development, math, science, social studies, creative arts, and physical development that are focused toward achieving progress outlined in the Head Start Early Learning Outcomes Framework: Ages Birth to Five.

(2) For dual language learners, a program must recognize bilingualism and biliteracy as strengths and implement research-based teaching practices that support their development. These practices must:

- (i) For an infant or toddler dual language learner, include teaching practices that focus on

the development of the home language, when there is a teacher with appropriate language competency, and experiences that expose the child to English;

(ii) For a preschool age dual language learner, include teaching practices that focus on both English language acquisition and the continued development of the home language; or,

(iii) If staff do not speak the home language of all children in the learning environment, include steps to support the development of the home language for dual language learners such as having culturally and linguistically appropriate materials available and other evidence-based strategies. Programs must work to identify volunteers who speak children's home language/s who could be trained to work in the classroom to support children's continued development of the home language.

(c) Learning environment. A program must ensure teachers implement well-organized learning environments with developmentally appropriate schedules, lesson plans, and indoor and outdoor learning experiences that provide adequate opportunities for choice, play, exploration, and experimentation among a variety of learning, sensory, and motor experiences and:

(1) For infants and toddlers, promote relational learning and include individualized and small group activities that integrate appropriate daily routines into a flexible schedule of learning experiences; and,

(2) For preschool age children, include teacher-directed and child-initiated activities, active and quiet learning activities, and opportunities for individual, small group, and large group learning activities.

(d) Materials and space for learning. To support implementation of the curriculum and the requirements described in paragraphs (a), (b), (c), and (e) of this section a program must provide age-appropriate equipment, materials, supplies and physical space for indoor and outdoor learning environments, including functional space. The equipment, materials and supplies must include any necessary accommodations and the space must be accessible to children with disabilities. Programs must change materials intentionally and periodically to support children's interests, development, and learning.

(e) Promoting learning through approaches to rest, meals, routines, and physical activity.

(1) A program must implement an intentional, age appropriate approach to accommodate children's need to nap or rest, and that, for preschool age children in a program that operates for 6 hours or longer per day provides a regular time every day at which preschool age children are encouraged but not forced to rest or nap. A program must provide alternative quiet learning activities for children who do not need or want to rest or nap.

(2) A program must implement snack and meal times in ways that support development and learning. For bottle-fed infants, this approach must include holding infants during feeding to support socialization. Snack and meal times must be structured and used as learning opportunities that support teaching staff-child interactions and foster communication and conversations that contribute to a child's learning, development, and socialization. Programs are encouraged to meet this requirement with family style meals when developmentally appropri-

ate. A program must also provide sufficient time for children to eat, not use food as reward or punishment, and not force children to finish their food.

(3) A program must approach routines, such as hand washing and diapering, and transitions between activities, as opportunities for strengthening development, learning, and skill growth.

(4) A program must recognize physical activity as important to learning and integrate intentional movement and physical activity into curricular activities and daily routines in ways that support health and learning. A program must not use physical activity as reward or punishment.

## **§1302.32 Curricula.**

### **(a) Curricula.**

(1) Center-based and family child care programs must implement developmentally appropriate research-based early childhood curricula, including additional curricular enhancements, as appropriate that:

(i) Are based on scientifically valid research and have standardized training procedures and curriculum materials to support implementation;

(ii) Are aligned with the Head Start Early Learning Outcomes Framework: Ages Birth to Five and, as appropriate, state early learning and development standards; and are sufficiently content-rich to promote measurable progress toward development and learning outlined in the Framework; and,

(iii) Have an organized developmental scope and sequence that include plans and materials for learning experiences based on developmental progressions and how children learn.

(2) A program must support staff to effectively implement curricula and at a minimum monitor curriculum implementation and fidelity, and provide support, feedback, and supervision for continuous improvement of its implementation through the system of training and professional development.

(b) Adaptation. A program that chooses to make significant adaptations to a curriculum or a curriculum enhancement described in paragraph (a)(1) of this section to better meet the needs of one or more specific populations must use an external early childhood education curriculum or content area expert to develop such significant adaptations. A program must assess whether the adaptation adequately facilitates progress toward meeting school readiness goals, consistent with the process described in §1302.102(b) and (c). Programs are encouraged to partner with outside evaluators in assessing such adaptations.

## **§1302.33 Child screenings and assessments.**

### **(a) Screening.**

(1) In collaboration with each child's parent and with parental consent, a program must com-

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plete or obtain a current developmental screening to identify concerns regarding a child's developmental, behavioral, motor, language, social, cognitive, and emotional skills within 45 calendar days of when the child first attends the program or, for the home-based program option, receives a home visit. A program that operates for 90 days or less must complete or obtain a current developmental screening within 30 calendar days of when the child first attends the program.

(2) A program must use one or more research-based developmental standardized screening tools to complete the screening. A program must use as part of the screening additional information from family members, teachers, and relevant staff familiar with the child's typical behavior.

(3) If warranted through screening and additional relevant information and with direct guidance from a mental health or child development professional a program must, with the parent's consent, promptly and appropriately address any needs identified through:

(i) Referral to the local agency responsible for implementing IDEA for a formal evaluation to assess the child's eligibility for services under IDEA as soon as possible, and not to exceed timelines required under IDEA; and,

(ii) Partnership with the child's parents and the relevant local agency to support families through the formal evaluation process.

(4) If a child is determined to be eligible for services under IDEA, the program must partner with parents and the local agency responsible for implementing IDEA, as appropriate, and deliver the services in subpart F of this part.

(5) If, after the formal evaluation described in paragraph (a)(3)(i) of this section, the local agency responsible for implementing IDEA determines the child is not eligible for early intervention or special education and related services under IDEA, the program must:

(i) Seek guidance from a mental health or child development professional to determine if the formal evaluation shows the child has a significant delay in one or more areas of development that is likely to interfere with the child's development and school readiness; and,

(ii) If the child has a significant delay, partner with parents to help the family access services and supports to help address the child's identified needs.

(A) Such additional services and supports may be available through a child's health insurance or it may be appropriate for the program to provide needed services and supports under section 504 of the Rehabilitation Act if the child satisfies the definition of disability in 29 U.S.C. section 705(9)(b) of the Rehabilitation Act, to ensure that the child who satisfies the definition of disability in 29 U.S.C. 705(9)(b) of the Rehabilitation Act is not excluded from the program on the basis of disability.

(B) A program may use program funds for such services and supports when no other sources of funding are available.

(b) Assessment for individualization.

- (1) A program must conduct standardized and structured assessments, which may be observation-based or direct, for each child that provide ongoing information to evaluate the child's developmental level and progress in outcomes aligned to the goals described in the Head Start Early Learning Child Outcomes Framework: Ages Birth to Five. Such assessments must result in usable information for teachers, home visitors, and parents and be conducted with sufficient frequency to allow for individualization within the program year.
- (2) A program must regularly use information from paragraph (b)(1) of this section along with informal teacher observations and additional information from family and staff, as relevant, to determine a child's strengths and needs, inform and adjust strategies to better support individualized learning and improve teaching practices in center-based and family child care settings, and improve home visit strategies in home-based models.
- (3) If warranted from the information gathered from paragraphs (b)(1) and (2) of this section and with direct guidance from a mental health or child development professional and a parent's consent, a program must refer the child to the local agency responsible for implementing IDEA for a formal evaluation to assess a child's eligibility for services under IDEA.

(c) Characteristics of screenings and assessments.

- (1) Screenings and assessments must be valid and reliable for the population and purpose for which they will be used, including by being conducted by qualified and trained personnel, and being age, developmentally, culturally and linguistically appropriate, and appropriate for children with disabilities, as needed.
- (2) If a program serves a child who speaks a language other than English, a program must use qualified bilingual staff, contractor, or consultant to:
  - (i) Assess language skills in English and in the child's home language, to assess both the child's progress in the home language and in English language acquisition;
  - (ii) Conduct screenings and assessments for domains other than language skills in the language or languages that best capture the child's development and skills in the specific domain; and,
  - (iii) Ensure those conducting the screening or assessment know and understand the child's language and culture and have sufficient skill level in the child's home language to accurately administer the screening or assessment and to record and understand the child's responses, interactions, and communications.
- (3) If a program serves a child who speaks a language other than English and qualified bilingual staff, contractors, or consultants are not able to conduct screenings and assessments, a program must use an interpreter in conjunction with a qualified staff person to conduct screenings and assessments as described in paragraphs (c)(2)(i) through (iii) of this section.
- (4) If a program serves a child who speaks a language other than English and can demonstrate that there is not a qualified bilingual staff person or interpreter, then screenings and assessments may be conducted in English. In such a case, a program must also gather and use other

information, including structured observations over time and information gathered in a child's home language from the family, for use in evaluating the child's development and progress.

(d) Prohibitions on use of screening and assessment data. The use of screening and assessment items and data on any screening or assessment authorized under this subchapter by any agent of the federal government is prohibited for the purposes of ranking, comparing, or otherwise evaluating individual children for purposes other than research, training, or technical assistance, and is prohibited for the purposes of providing rewards or sanctions for individual children or staff. A program must not use screening or assessments to exclude children from enrollment or participation.

### **§1302.34 Parent and family engagement in education and child development services.**

(a) Purpose. Center-based and family child care programs must structure education and child development services to recognize parents' roles as children's lifelong educators, and to encourage parents to engage in their child's education.

(b) Engaging parents and family members. A program must offer opportunities for parents and family members to be involved in the program's education services and implement policies to ensure:

- (1) The program's settings are open to parents during all program hours;
- (2) Teachers regularly communicate with parents to ensure they are well-informed about their child's routines, activities, and behavior;
- (3) Teachers hold parent conferences, as needed, but no less than two times per program year, to enhance the knowledge and understanding of both staff and parents of the child's education and developmental progress and activities in the program;
- (4) Parents have the opportunity to learn about and to provide feedback on selected curricula and instructional materials used in the program;
- (5) Parents and family members have opportunities to volunteer in the class and during group activities;
- (6) Teachers inform parents, about the purposes of and the results from screenings and assessments and discuss their child's progress;
- (7) Teachers, except those described in paragraph (b)(8) of this section, conduct at least two home visits per program year for each family, including one before the program year begins, if feasible, to engage the parents in the child's learning and development, except that such visits may take place at a program site or another safe location that affords privacy at the parent's request, or if a visit to the home presents significant safety hazards for staff; and,
- (8) Teachers that serve migrant or seasonal families make every effort to conduct home visits to engage the family in the child's learning and development.

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## §1302.35 Education in home-based programs.

(a) Purpose. A home-based program must provide home visits and group socialization activities that promote secure parent-child relationships and help parents provide high-quality early learning experiences in language, literacy, mathematics, social and emotional functioning, approaches to learning, science, physical skills, and creative arts. A program must implement a research-based curriculum that delivers developmentally, linguistically, and culturally appropriate home visits and group socialization activities that support children's cognitive, social, and emotional growth for later success in school.

(b) Home-based program design. A home-based program must ensure all home visits are:

- (1) Planned jointly by the home visitor and parents, and reflect the critical role of parents in the early learning and development of their children, including that the home visitor is able to effectively communicate with the parent, directly or through an interpreter;
- (2) Planned using information from ongoing assessments that individualize learning experiences;
- (3) Scheduled with sufficient time to serve all enrolled children in the home and conducted with parents and are not conducted when only babysitters or other temporary caregivers are present;
- (4) Scheduled with sufficient time and appropriate staff to ensure effective delivery of services described in subparts D, E, F, and G of this part through home visiting, to the extent possible.

(c) Home visit experiences. A program that operates the home-based option must ensure all home visits focus on promoting high-quality early learning experiences in the home and growth towards the goals described in the Head Start Early Learning Outcomes Framework: Ages Birth to Five and must use such goals and the curriculum to plan home visit activities that implement:

- (1) Age and developmentally appropriate, structured child-focused learning experiences;
- (2) Strategies and activities that promote parents' ability to support the child's cognitive, social, emotional, language, literacy, and physical development;
- (3) Strategies and activities that promote the home as a learning environment that is safe, nurturing, responsive, and language- and communication- rich;
- (4) Research-based strategies and activities for children who are dual language learners that recognize bilingualism and biliteracy as strengths, and:
  - (i) For infants and toddlers, focus on the development of the home language, while providing experiences that expose both parents and children to English; and,
  - (ii) For preschoolers, focus on both English language acquisition and the continued development of the home language; and,
- (5) Follow-up with the families to discuss learning experiences provided in the home between

each visit, address concerns, and inform strategies to promote progress toward school readiness goals.

(d) Home-based curriculum. A program that operates the home-based option must:

(1) Ensure home-visiting and group socializations implement a developmentally appropriate research-based early childhood home-based curriculum that:

(i) Promotes the parent's role as the child's teacher through experiences focused on the parent-child relationship and, as appropriate, the family's traditions, culture, values, and beliefs;

(ii) Aligns with the Head Start Early Learning Outcomes Framework: Ages Birth to Five and, as appropriate, state early learning standards, and, is sufficiently content-rich within the Framework to promote measurable progress toward goals outlined in the Framework; and,

(iii) Has an organized developmental scope and sequence that includes plans and materials for learning experiences based on developmental progressions and how children learn.

(2) Support staff in the effective implementation of the curriculum and at a minimum monitor curriculum implementation and fidelity, and provide support, feedback, and supervision for continuous improvement of its implementation through the system of training and professional development.

(3) If a program chooses to make significant adaptations to a curriculum or curriculum enhancement to better meet the needs of one or more specific populations, a program must:

(i) Partner with early childhood education curriculum or content experts; and,

(ii) Assess whether the adaptation adequately facilitates progress toward meeting school readiness goals consistent with the process described in §1302.102(b) and (c).

(4) Provide parents with an opportunity to review selected curricula and instructional materials used in the program.

(e) Group socialization.

(1) A program that operates the home-based option must ensure group socializations are planned jointly with families, conducted with both child and parent participation, occur in a classroom, community facility, home or field trip setting, as appropriate.

(2) Group socializations must be structured to:

(i) Provide age appropriate activities for participating children that are intentionally aligned to school readiness goals, the Head Start Early Learning Outcomes Framework: Ages Birth to Five and the home-based curriculum; and,

(ii) Encourage parents to share experiences related to their children's development with

other parents in order to strengthen parent-child relationships and to help promote parents understanding of child development;

(3) For parents with preschoolers, group socializations also must provide opportunities for parents to participate in activities that support parenting skill development or family partnership goals identified in §1302.52(c), as appropriate and must emphasize peer group interactions designed to promote children’s social, emotional and language development, and progress towards school readiness goals, while encouraging parents to observe and actively participate in activities, as appropriate.

(f) Screening and assessments. A program that operates the home-based option must implement provisions in §1302.33 and inform parents about the purposes of and the results from screenings and assessments and discuss their child's progress.

### **§1302.36 Tribal language preservation and revitalization.**

A program that serves American Indian and Alaska Native children may integrate efforts to preserve, revitalize, restore, or maintain the tribal language for these children into program services. Such language preservation and revitalization efforts may include full immersion in the tribal language for the majority of the hours of planned class operations. If children’s home language is English, exposure to English as described in §1302.31(b)(2)(i) and (ii) is not required.

## **Subpart D — Health Program Services**

### **§1302.40 Purpose.**

(a) A program must provide high-quality health, oral health, mental health, and nutrition services that are developmentally, culturally, and linguistically appropriate and that will support each child’s growth and school readiness.

(b) A program must establish and maintain a Health Services Advisory Committee that includes Head Start parents, professionals, and other volunteers from the community.

### **§1302.41 Collaboration and communication with parents.**

(a) For all activities described in this part, programs must collaborate with parents as partners in the health and well-being of their children in a linguistically and culturally appropriate manner and communicate with parents about their child’s health needs and development concerns in a timely and effective manner.

(b) At a **minimum**, a program must:

(1) Obtain advance authorization from the parent or other person with legal authority for all health and developmental procedures administered through the program or by contract or agreement, and, maintain written documentation if they refuse to give authorization for health services; and,

(2) Share with parents the policies for health emergencies that require rapid response on the part of staff or immediate medical attention.

## **§1302.42 Child health status and care.**

### **(a) Source of health care.**

(1) A program, within 30 calendar days after the child first attends the program or, for the home-based program option, receives a home visit, 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.

(2) If the child does not have such a source of ongoing care and health insurance coverage or access to care through the Indian Health Service, the program must assist families in accessing a source of care and health insurance that will meet these criteria, as quickly as possible.

### **(b) Ensuring up-to-date child health status.**

(1) Within 90 calendar days after the child first attends the program or, for the home-based program option, receives a home visit, with the exceptions noted in paragraph (b)(3) of this section, a program must:

(i) Obtain determinations from health care and oral health care professionals as to whether or not the child is up-to-date on a schedule of age appropriate preventive and primary medical and oral health care, based on: the well-child visits and dental periodicity schedules as prescribed by the Early and Periodic Screening, Diagnosis, and Treatment (EPSDT) program of the Medicaid agency of the state in which they operate, immunization recommendations issued by the Centers for Disease Control and Prevention, and any additional recommendations from the local Health Services Advisory Committee that are based on prevalent community health problems;

(ii) Assist parents with making arrangements to bring the child up-to-date as quickly as possible; and, if necessary, directly facilitate provision of health services to bring the child up-to-date with parent consent as described in §1302.41(b)(1).

(2) Within 45 calendar days after the child first attends the program or, for the home-based program option, receives a home visit, a program must either obtain or perform evidence-based vision and hearing screenings.

(3) If a program operates for 90 days or less, it has 30 days from the date the child first attends the program to satisfy paragraphs (b)(1) and (2) of this section.

(4) A program must identify each child’s nutritional health needs, taking into account available health information, including the child’s health records, and family and staff concerns, including special dietary requirements, food allergies, and community nutrition issues as identified through the community assessment or by the Health Services Advisory Committee.

### **(c) Ongoing care.**

- (1) A program must help parents continue to follow recommended schedules of well-child and oral health care.
- (2) A program must implement periodic observations or other appropriate strategies for program staff and parents to identify any new or recurring developmental, medical, oral, or mental health concerns.
- (3) A program must facilitate and monitor necessary oral health preventive care, treatment and follow-up, including topical fluoride treatments. In communities where there is a lack of adequate fluoride available through the water supply and for every child with moderate to severe tooth decay, a program must also facilitate fluoride supplements, and other necessary preventive measures, and further oral health treatment as recommended by the oral health professional.

(d) Extended follow-up care.

- (1) A program must facilitate further diagnostic testing, evaluation, treatment, and follow-up plan, as appropriate, by a licensed or certified professional for each child with a health problem or developmental delay, such as elevated lead levels or abnormal hearing or vision results that may affect child's development, learning, or behavior.
- (2) A program must develop a system to track referrals and services provided and monitor the implementation of a follow-up plan to meet any treatment needs associated with a health, oral health, social and emotional, or developmental problem.
- (3) A program must assist parents, as needed, in obtaining any prescribed medications, aids or equipment for medical and oral health conditions.

(e) Use of funds.

- (1) A program must use program funds for the provision of diapers and formula for enrolled children during the program day.
- (2) A program may use program funds for professional medical and oral health services when no other source of funding is available. When program funds are used for such services, grantee and delegate agencies must have written documentation of their efforts to access other available sources of funding.

### **§1302.43 Oral health practices.**

A program must promote effective oral health hygiene by ensuring all children with teeth are assisted by appropriate staff, or volunteers, if available, in brushing their teeth with toothpaste containing fluoride once daily.

### **§1302.44 Child nutrition.**

(a) Nutrition service requirements.

- (1) A program must design and implement nutrition services that are culturally and develop-

mentally appropriate, meet the nutritional needs of and accommodate the feeding requirements of each child, including children with special dietary needs and children with disabilities. Family style meals are encouraged as described in §1302.31 (e)(2).

(2) Specifically, a program must:

- (i) Ensure each child in a program that operates for fewer than six hours per day receives meals and snacks that provide one third to one half of the child's daily nutritional needs;
- (ii) Ensure each child in a program that operates for six hours or more per day receives meals and snacks that provide one half to two thirds of the child's daily nutritional needs, depending upon the length of the program day;
- (iii) Serve three- to five-year-olds meals and snacks that conform to USDA requirements in 7 CFR parts 210, 220, and 226, and are high in nutrients and low in fat, sugar, and salt;
- (iv) Feed infants and toddlers according to their individual developmental readiness and feeding skills as recommended in USDA requirements outlined in 7 CFR parts 210, 220, and 226, and ensure infants and young toddlers are fed on demand to the extent possible;
- (v) Ensure bottle-fed infants are never laid down to sleep with a bottle;
- (vi) Serve all children in morning center-based settings who have not received breakfast upon arrival at the program a nourishing breakfast;
- (vii) Provide appropriate healthy snacks and meals to each child during group socialization activities in the home-based option;
- (viii) Promote breastfeeding, including providing facilities to properly store and handle breast milk and make accommodations, as necessary, for mothers who wish to breast-feed during program hours, and if necessary, provide referrals to lactation consultants or counselors; and,
- (ix) Make safe drinking water available to children during the program day.

(b) Payment sources. A program must use funds from USDA Food, Nutrition, and Consumer Services child nutrition programs as the primary source of payment for meal services. Early Head Start and Head Start funds may be used to cover those allowable costs not covered by the USDA.

## **§ 1302.45 Child mental health and social and emotional well-being.**

(a) Wellness promotion. To support a program-wide culture that promotes children's mental health, social and emotional well-being, and overall health, a program must:

- (1) Provide supports for effective classroom management and positive learning environments; supportive teacher practices; and, strategies for supporting children with challenging behaviors and other social, emotional, and mental health concerns;
- (2) Secure mental health consultation services on a schedule of sufficient and consistent fre-

quency to ensure a mental health consultant is available to partner with staff and families in a timely and effective manner;

- (3) Obtain parental consent for mental health consultation services at enrollment; and,
- (4) Build community partnerships to facilitate access to additional mental health resources and services, as needed.

(b) Mental health consultants. A program must ensure mental health consultants assist:

- (1) The program to implement strategies to identify and support children with mental health and social and emotional concerns;
- (2) Teachers, including family child care providers, to improve classroom management and teacher practices through strategies that include using classroom observations and consultations to address teacher and individual child needs and creating physical and cultural environments that promote positive mental health and social and emotional functioning ;
- (3) Other staff, including home visitors, to meet children’s mental health and social and emotional needs through strategies that include observation and consultation;
- (4) Staff to address prevalent child mental health concerns, including internalizing problems such as appearing withdrawn and externalizing problems such as challenging behaviors; and,
- (5) In helping both parents and staff to understand mental health and access mental health interventions, if needed.
- (6) In the implementation of the policies to limit suspension and prohibit expulsion as described in §1302.17.

**§1302.46 Family support services for health, nutrition, and mental health.**

(a) Parent collaboration. Programs must collaborate with parents to promote children’s health and well-being by providing medical, oral, nutrition and mental health education support services that are understandable to individuals, including individuals with low health literacy.

(b) Opportunities.

(1) Such collaboration must include opportunities for parents to:

- (i) Learn about preventive medical and oral health care, emergency first aid, environmental hazards, and health and safety practices for the home including health and developmental consequences of tobacco products use and exposure to lead, and safe sleep;
- (ii) Discuss their child’s nutritional status with staff, including the importance of physical activity, healthy eating, and the negative health consequences of sugar-sweetened beverages, and how to select and prepare nutritious foods that meet the family’s nutrition and food budget needs;
- (iii) Learn about healthy pregnancy and postpartum care, as appropriate, including

breastfeeding support and treatment options for parental mental health or substance abuse problems, including perinatal depression;

(iv) Discuss with staff and identify issues related to child mental health and social and emotional well-being, including observations and any concerns about their child's mental health, typical and atypical behavior and development, and how to appropriately respond to their child and promote their child's social and emotional development; and,

(v) Learn about appropriate vehicle and pedestrian safety for keeping children safe.

(2) A program must provide ongoing support to assist parents' navigation through health systems to meet the general health and specifically identified needs of their children and must assist parents:

(i) In understanding how to access health insurance for themselves and their families, including information about private and public health insurance and designated enrollment periods;

(ii) In understanding the results of diagnostic and treatment procedures as well as plans for ongoing care; and,

(iii) In familiarizing their children with services they will receive while enrolled in the program and to enroll and participate in a system of ongoing family health care.

## **§1302.47 Safety practices.**

(a) A program must establish, train staff on, implement, and enforce a system of health and safety practices that ensure children are kept safe at all times. A program should consult Caring for our Children Basics, available at [http://www.acf.hhs.gov/sites/default/files/ece/caring\\_for\\_our\\_children\\_basics.pdf](http://www.acf.hhs.gov/sites/default/files/ece/caring_for_our_children_basics.pdf), for additional information to develop and implement adequate safety policies and practices described in this part.

(b) A program must develop and implement a system of management, including ongoing training, oversight, correction and continuous improvement in accordance with §1302.102, that includes policies and practices to ensure all facilities, equipment and materials, background checks, safety training, safety and hygiene practices and administrative safety procedures are adequate to ensure child safety. This system must ensure:

(1) Facilities. All facilities where children are served, including areas for learning, playing, sleeping, toileting, and eating are, at a minimum:

(i) Meet licensing requirements in accordance with §§1302.21(d)(1) and 1302.23(d);

(ii) Clean and free from pests;

(iii) Free from pollutants, hazards and toxins that are accessible to children and could endanger children's safety;

(iv) Designed to prevent child injury and free from hazards, including choking, strangu-

lation, electrical, and drowning hazards, hazards posed by appliances and all other safety hazards;

(v) Well lit, including emergency lighting;

(vi) Equipped with safety supplies that are readily accessible to staff, including, at a minimum, fully-equipped and up-to-date first aid kits and appropriate fire safety supplies;

(vii) Free from firearms or other weapons that are accessible to children;

(viii) Designed to separate toileting and diapering areas from areas for preparing food, cooking, eating, or children's activities; and,

(ix) Kept safe through an ongoing system of preventative maintenance.

(2) Equipment and materials. Indoor and outdoor play equipment, cribs, cots, feeding chairs, strollers, and other equipment used in the care of enrolled children, and as applicable, other equipment and materials meet standards set by the Consumer Product Safety Commission (CPSC) or the American Society for Testing and Materials, International (ASTM). All equipment and materials must at a minimum:

(i) Be clean and safe for children's use and are appropriately disinfected;

(ii) Be accessible only to children for whom they are age appropriate;

(iii) Be designed to ensure appropriate supervision of children at all times;

(iv) Allow for the separation of infants and toddlers from preschoolers during play in center-based programs; and,

(v) Be kept safe through an ongoing system of preventative maintenance.

(3) Background checks. All staff have complete background checks in accordance with §1302.90(b).

(4) Safety training.

(i) Staff with regular child contact. All staff with regular child contact have initial orientation training within three months of hire and ongoing training in all state, local, tribal, federal and program-developed health, safety and child care requirements to ensure the safety of children in their care; including, at a minimum, and as appropriate based on staff roles and ages of children they work with, training in:

(A) The prevention and control of infectious diseases;

(B) Prevention of sudden infant death syndrome and use of safe sleeping practices;

(C) Administration of medication, consistent with standards for parental consent;

(D) Prevention and response to emergencies due to food and allergic reactions;

- (E) Building and physical premises safety, including identification of and protection from hazards, bodies of water, and vehicular traffic;
- (F) Prevention of shaken baby syndrome, abusive head trauma, and child maltreatment;
- (G) Emergency preparedness and response planning for emergencies;
- (H) Handling and storage of hazardous materials and the appropriate disposal of biocontaminants;
- (I) Appropriate precautions in transporting children, if applicable;
- (J) First aid and cardiopulmonary resuscitation; and,
- (K) Recognition and reporting of child abuse and neglect, in accordance with the requirement at paragraph (b)(5) of this section.

(ii) Staff without regular child contact. All staff with no regular responsibility for or contact with children have initial orientation training within three months of hire; ongoing training in all state, local, tribal, federal and program-developed health and safety requirements applicable to their work; and training in the program's emergency and disaster preparedness procedures.

(5) Safety practices. All staff and consultants follow appropriate practices to keep children safe during all activities, including, at a minimum:

- (i) Reporting of suspected or known child abuse and neglect, including that staff comply with applicable federal, state, local, and tribal laws;
- (ii) Safe sleep practices, including ensuring that all sleeping arrangements for children under 18 months of age use firm mattresses or cots, as appropriate, and for children under 12 months, soft bedding materials or toys must not be used;
- (iii) Appropriate indoor and outdoor supervision of children at all times;
- (iv) Only releasing children to an authorized adult, and;
- (v) All standards of conduct described in §1302.90(c).

(6) Hygiene practices. All staff systematically and routinely implement hygiene practices that at a minimum ensure:

- (i) Appropriate toileting, hand washing, and diapering procedures are followed;
- (ii) Safe food preparation; and,
- (iii) Exposure to blood and body fluids are handled consistent with standards of the Occupational Safety Health Administration.

(7) Administrative safety procedures. Programs establish, follow, and practice, as appropriate, procedures for, at a minimum:

- (i) Emergencies;
- (ii) Fire prevention and response;
- (iii) Protection from contagious disease, including appropriate inclusion and exclusion policies for when a child is ill, and from an infectious disease outbreak, including appropriate notifications of any reportable illness;
- (iv) The handling, storage, administration, and record of administration of medication;
- (v) Maintaining procedures and systems to ensure children are only released to an authorized adult; and,
- (vi) Child specific health care needs and food allergies that include accessible plans of action for emergencies. For food allergies, a program must also post individual child food allergies prominently where staff can view wherever food is served.

(8) Disaster preparedness plan. The program has all-hazards emergency management/disaster preparedness and response plans for more and less likely events including natural and man-made disasters and emergencies, and violence in or near programs.

(c) A program must report any safety incidents in accordance with §1302.102(d)(1)(ii).

## **Subpart E — Family and Community Engagement Program Services**

### **§1302.50 Family engagement.**

(a) Purpose. A program must integrate parent and family engagement strategies into all systems and program services to support family well-being and promote children’s learning and development. Programs are encouraged to develop innovative two-generation approaches that address prevalent needs of families across their program that may leverage community partnerships or other funding sources.

(b) Family engagement approach. A program must:

- (1) Recognize parents as their children’s primary teachers and nurturers and implement intentional strategies to engage parents in their children’s learning and development and support parent-child relationships, including specific strategies for father engagement;
- (2) Develop relationships with parents and structure services to encourage trust and respectful, ongoing two-way communication between staff and parents to create welcoming program environments that incorporate the unique cultural, ethnic, and linguistic backgrounds of families in the program and community;
- (3) Collaborate with families in a family partnership process that identifies needs, interests, strengths, goals, and services and resources that support family well-being, including family safety, health, and economic stability;

- (4) Provide parents with opportunities to participate in the program as employees or volunteers;
- (5) Conduct family engagement services in the family's preferred language, or through an interpreter, to the extent possible, and ensure families have the opportunity to share personal information in an environment in which they feel safe; and,
- (6) Implement procedures for teachers, home visitors, and family support staff to share information with each other, as appropriate and consistent with the requirements in part 1303 subpart C, of this chapter; FERPA; or IDEA, to ensure coordinated family engagement strategies with children and families in the classroom, home, and community.

### **§1302.51 Parent activities to promote child learning and development.**

- (a) A program must promote shared responsibility with parents for children's early learning and development, and implement family engagement strategies that are designed to foster parental confidence and skills in promoting children's learning and development. These strategies must include:
  - (1) Offering activities that support parent-child relationships and child development including language, dual language, literacy, and bi-literacy development as appropriate;
  - (2) Providing parents with information about the importance of their child's regular attendance, and partner with them, as necessary, to promote consistent attendance; and,
  - (3) For dual language learners, information and resources for parents about the benefits of bilingualism and biliteracy.
- (b) A program must, at a minimum, offer opportunities for parents to participate in a research-based parenting curriculum that builds on parents' knowledge and offers parents the opportunity to practice parenting skills to promote children's learning and development. A program that chooses to make significant adaptations to the parenting curriculum to better meet the needs of one or more specific populations must work with an expert or experts to develop such adaptations.

### **§1302.52 Family partnership services.**

- (a) Family partnership process. A program must implement a family partnership process that includes a family partnership agreement and the activities described in this section to support family well-being, including family safety, health, and economic stability, to support child learning and development, to provide, if applicable, services and supports for children with disabilities, and to foster parental confidence and skills that promote the early learning and development of their children. The process must be initiated as early in the program year as possible and continue for as long as the family participates in the program, based on parent interest and need.
- (b) Identification of family strengths and needs. A program must implement intake and family assessment procedures to identify family strengths and needs related to the family engagement outcomes as described in the Head Start Parent Family and Community Engagement Framework, including family well-being, parent-child relationships, families as lifelong educators, families as

learners, family engagement in transitions, family connections to peers and the local community, and families as advocates and leaders.

(c) Individualized family partnership services. A program must offer individualized family partnership services that:

- (1) Collaborate with families to identify interests, needs, and aspirations related to the family engagement outcomes described in paragraph (b) of this section;
- (2) Help families achieve identified individualized family engagement outcomes;
- (3) Establish and implement a family partnership agreement process that is jointly developed and shared with parents in which staff and families to review individual progress, revise goals, evaluate and track whether identified needs and goals are met, and adjust strategies on an ongoing basis, as necessary, and;
- (4) Assign staff and resources based on the urgency and intensity of identified family needs and goals.

(d) Existing plans and community resources. In implementing this section, a program must take into consideration any existing plans for the family made with other community agencies and availability of other community resources to address family needs, strengths, and goals, in order to avoid duplication of effort.

### **§1302.53 Community partnerships and coordination with other early childhood and education programs.**

(a) Community partnerships.

- (1) A program must establish ongoing collaborative relationships and partnerships with community organizations such as establishing joint agreements, procedures, or contracts and arranging for onsite delivery of services as appropriate, to facilitate access to community services that are responsive to children's and families' needs and family partnership goals, and community needs and resources, as determined by the community assessment.
- (2) A program must establish necessary collaborative relationships and partnerships, with community organizations that may include:
  - (i) Health care providers, including child and adult mental health professionals, Medicaid managed care networks, dentists, other health professionals, nutritional service providers, providers of prenatal and postnatal support, and substance abuse treatment providers;
  - (ii) Individuals and agencies that provide services to children with disabilities and their families, elementary schools, state preschool providers, and providers of child care services;
  - (iii) Family preservation and support services and child protective services and any other agency to which child abuse must be reported under state or tribal law;

- (iv) Educational and cultural institutions, such as libraries and museums, for both children and families;
- (v) Temporary Assistance for Needy Families, nutrition assistance agencies, workforce development and training programs, adult or family literacy, adult education, and post-secondary education institutions, and agencies or financial institutions that provide asset-building education, products and services to enhance family financial stability and savings;
- (vi) Housing assistance agencies and providers of support for children and families experiencing homelessness, including the local educational agency liaison designated under section 722(g)(1)(J)(ii) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 *et seq.*);
- (vii) Domestic violence prevention and support providers; and,
- (viii) Other organizations or businesses that may provide support and resources to families.

(b) Coordination with other programs and systems. A program must take an active role in promoting coordinated systems of comprehensive early childhood services to low-income children and families in their community through communication, cooperation, and the sharing of information among agencies and their community partners, while protecting the privacy of child records in accordance with subpart C of part 1303 of this chapter and applicable federal, state, local, and tribal laws.

(1) Memorandum of understanding. To support coordination between Head Start and publicly funded preschool programs, a program must enter into a memorandum of understanding with the appropriate local entity responsible for managing publicly funded preschool programs in the service area of the program, as described in section 642(e)(5) of the Act.

(2) Quality Rating and Improvement Systems. A program, with the exception of American Indian and Alaska Native programs, must participate in its state or local Quality Rating and Improvement System (QRIS) if:

- (i) Its state or local QRIS accepts Head Start monitoring data to document quality indicators included in the state's tiered system;
- (ii) Participation would not impact a program's ability to comply with the Head Start Program Performance Standards; and,
- (iii) The program has not provided the Office of Head Start with a compelling reason not to comply with this requirement.

(3) Data systems. A program, with the exception of American Indian and Alaska Native programs unless they would like to and to the extent practicable, should integrate and share relevant data with state education data systems, to the extent practicable, if the program can receive similar support and benefits as other participating early childhood programs.

(4) American Indian and Alaska Native programs. An American Indian and Alaska Native

program should determine whether or not it will participate in the systems described in paragraphs (b)(2) and (3) of this section.

## **Subpart F — Additional Services for Children with Disabilities**

### **§1302.60 Full participation in program services and activities.**

A program must ensure enrolled children with disabilities, including but not limited to those who are eligible for services under IDEA, and their families receive all applicable program services delivered in the least restrictive possible environment and that they fully participate in all program activities.

### **§1302.61 Additional services for children.**

(a) Additional services for children with disabilities. Programs must ensure the individualized needs of children with disabilities, including but not limited to those eligible for services under IDEA, are being met and all children have access to and can fully participate in the full range of activities and services. Programs must provide any necessary modifications to the environment, multiple and varied formats for instruction, and individualized accommodations and supports as necessary to support the full participation of children with disabilities. Programs must ensure all individuals with disabilities are protected from discrimination under and provided with all services and program modifications required by section 504 of the Rehabilitation Act (29 U.S.C. 794), the Americans with Disabilities Act (42 U.S.C. 12101 *et seq.*), and their implementing regulations.

(b) Services during IDEA eligibility determination. While the local agency responsible for implementing IDEA determines a child's eligibility, a program must provide individualized services and supports, to the maximum extent possible, to meet the child's needs. Such additional supports may be available through a child's health insurance or it may be appropriate or required to provide the needed services and supports under section 504 of the Rehabilitation Act if the child satisfies the definition of disability in section 705(9)(b) of the Rehabilitation Act. When such supports are not available through alternate means, pending the evaluation results and eligibility determination, a program must individualize program services based on available information such as parent input and child observation and assessment data and may use program funds for these purposes.

(c) Additional services for children with an IFSP or IEP. To ensure the individual needs of children eligible for services under IDEA are met, a program must:

- (1) Work closely with the local agency responsible for implementing IDEA, the family, and other service partners, as appropriate, to ensure:
  - (i) Services for a child with disabilities will be planned and delivered as required by their IFSP or IEP, as appropriate;
  - (ii) Children are working towards the goals in their IFSP or IEP;
  - (iii) Elements of the IFSP or IEP that the program cannot implement are implemented by other appropriate agencies, related service providers and specialists;

- (iv) IFSPs and IEPs are being reviewed and revised, as required by IDEA; and,
  - (v) Services are provided in a child's regular Early Head Start or Head Start classroom or family child care home to the greatest extent possible.
- (2) Plan and implement the transition services described in subpart G of this part, including at a minimum:
- (i) For children with an IFSP who are transitioning out of Early Head Start, collaborate with the parents, and the local agency responsible for implementing IDEA, to ensure appropriate steps are undertaken in a timely and appropriate manner to determine the child's eligibility for services under Part B of IDEA; and,
  - (ii) For children with an IEP who are transitioning out of Head Start to kindergarten, collaborate with the parents, and the local agency responsible for implementing IDEA, to ensure steps are undertaken in a timely and appropriate manner to support the child and family as they transition to a new setting.

## **§1302.62 Additional services for parents.**

### **(a) Parents of all children with disabilities.**

- (1) A program must collaborate with parents of children with disabilities, including but not limited to children eligible for services under IDEA, to ensure the needs of their children are being met, including support to help parents become advocates for services that meet their children's needs and information and skills to help parents understand their child's disability and how to best support the child's development;
- (2) A program must assist parents to access services and resources for their family, including securing adaptive equipment and devices and supports available through a child's health insurance or other entities, creating linkages to family support programs, and helping parents establish eligibility for additional support programs, as needed and practicable.

### **(b) Parents of children eligible for services under IDEA.** For parents of children eligible for services under IDEA, a program must also help parents:

- (1) Understand the referral, evaluation, and service timelines required under IDEA;
- (2) Actively participate in the eligibility process and IFSP or IEP development process with the local agency responsible for implementing IDEA, including by informing parents of their right to invite the program to participate in all meetings;
- (3) Understand the purposes and results of evaluations and services provided under an IFSP or IEP; and,
- (4) Ensure their children's needs are accurately identified in, and addressed through, the IFSP or IEP.

## **§1302.63 Coordination and collaboration with the local agency responsible for implementing IDEA.**

- (a) A program must coordinate with the local agency responsible for implementing IDEA to identify children enrolled or who intend to enroll in a program that may be eligible for services under IDEA, including through the process described in §1302.33(a)(3) and through participation in the local agency Child Find efforts.
- (b) A program must work to develop interagency agreements with the local agency responsible for implementing IDEA to improve service delivery to children eligible for services under IDEA, including the referral and evaluation process, service coordination, promotion of service provision in the least restrictive appropriate community-based setting and reduction in dual enrollment which causes reduced time in a less restrictive setting, and transition services as children move from services provided under Part C of IDEA to services provided under Part B of IDEA and from pre-school to kindergarten.
- (c) A program must participate in the development of the IFSP or IEP if requested by the child's parents, and the implementation of the IFSP or IEP. At a minimum, the program must offer:
- (1) To provide relevant information from its screenings, assessments, and observations to the team developing a child's IFSP or IEP; and,
  - (2) To participate in meetings with the local agency responsible for implementing IDEA to develop or review an IEP or IFSP for a child being considered for Head Start enrollment, a currently enrolled child, or a child transitioning from a program.
- (d) A program must retain a copy of the IEP or IFSP for any child enrolled in Head Start for the time the child is in the program, consistent with the IDEA requirements in 34 CFR parts 300 and 303.

## **Subpart G — Transition Services**

### **§1302.70 Transitions from Early Head Start.**

- (a) Implementing transition strategies and practices. An Early Head Start program must implement strategies and practices to support successful transitions for children and their families transitioning out of Early Head Start.
- (b) Timing for transitions. To ensure the most appropriate placement and service following participation in Early Head Start, such programs must, at least six months prior to each child's third birthday, implement transition planning for each child and family that:
- (1) Takes into account the child's developmental level and health and disability status, progress made by the child and family while in Early Head Start, current and changing family circumstances and, the availability of Head Start, other public pre-kindergarten, and other early education and child development services in the community that will meet the needs of the child and family; and,

(2) Transitions the child into Head Start or another program as soon as possible after the child's third birthday but permits the child to remain in Early Head Start for a limited number of additional months following the child's third birthday if necessary for an appropriate transition.

(c) Family collaborations. A program must collaborate with parents of Early Head Start children to implement strategies and activities that support successful transitions from Early Head Start and, at a minimum, provide information about the child's progress during the program year and provide strategies for parents to continue their involvement in and advocacy for the education and development of their child.

(d) Early Head Start and Head Start collaboration. Early Head Start and Head Start programs must work together to maximize enrollment transitions from Early Head Start to Head Start, consistent with the eligibility provisions in subpart A, and promote successful transitions through collaboration and communication.

(e) Transition services for children with an IFSP. A program must provide additional transition services for children with an IFSP, at a minimum, as described in subpart F of this part.

**§1302.71 Transitions from Head Start to kindergarten.**

(a) Implementing transition strategies and practices. A program that serves children who will enter kindergarten in the following year must implement transition strategies to support a successful transition to kindergarten.

(b) Family collaborations for transitions.

(1) A program must collaborate with parents of enrolled children to implement strategies and activities that will help parents advocate for and promote successful transitions to kindergarten for their children, including their continued involvement in the education and development of their child.

(2) At a minimum, such strategies and activities must:

- (i) Help parents understand their child's progress during Head Start;
- (ii) Help parents understand practices they use to effectively provide academic and social support for their children during their transition to kindergarten and foster their continued involvement in the education of their child;
- (iii) Prepare parents to exercise their rights and responsibilities concerning the education of their children in the elementary school setting, including services and supports available to children with disabilities and various options for their child to participate in language instruction educational programs; and,
- (iv) Assist parents in the ongoing communication with teachers and other school personnel so that parents can participate in decisions related to their children's education.

(c) Community collaborations for transitions. (1) A program must collaborate with local education agencies to support family engagement under section 642(b)(13) of the Act and state departments

of education, as appropriate, and kindergarten teachers to implement strategies and activities that promote successful transitions to kindergarten for children, their families, and the elementary school.

(2) At a minimum, such strategies and activities must include:

- (i) Coordination with schools or other appropriate agencies to ensure children’s relevant records are transferred to the school or next placement in which a child will enroll, consistent with privacy requirements in subpart C of part 1303 of this chapter;
- (ii) Communication between appropriate staff and their counterparts in the schools to facilitate continuity of learning and development, consistent with privacy requirements in subpart C of part 1303 of this chapter; and,
- (iii) Participation, as possible, for joint training and professional development activities for Head Start and kindergarten teachers and staff.

(3) A program that does not operate during the summer must collaborate with school districts to determine the availability of summer school programming for children who will be entering kindergarten and work with parents and school districts to enroll children in such programs, as appropriate.

(d) Learning environment activities. A program must implement strategies and activities in the learning environment that promote successful transitions to kindergarten for enrolled children, and at a minimum, include approaches that familiarize children with the transition to kindergarten and foster confidence about such transition.

(e) Transition services for children with an IEP. A program must provide additional transition services for children with an IEP, at a minimum, as described in subpart F of this part.

**§1302.72 Transitions between programs.**

(a) For families and children who move out of the community in which they are currently served, including homeless families and foster children, a program must undertake efforts to support effective transitions to other Early Head Start or Head Start programs. If Early Head Start or Head Start is not available, the program should assist the family to identify another early childhood program that meets their needs.

(b) A program that serves children whose families have decided to transition them to other early education programs, including public pre-kindergarten, in the year prior to kindergarten entry must undertake strategies and activities described in §1302.71 (b) and (c)(1) and (2), as practicable and appropriate.

(c) A migrant or seasonal Head Start program must undertake efforts to support effective transitions to other migrant or seasonal Head Start or, if appropriate, Early Head Start or Head Start programs for families and children moving out of the community in which they are currently served.

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## **Subpart H — Services to Enrolled Pregnant Women**

### **§1302.80 Enrolled pregnant women.**

- (a) Within 30 days of enrollment, a program must determine whether each enrolled pregnant woman has an ongoing source of continuous, accessible health care – provided by a health care professional that maintains her ongoing health record and is not primarily a source of emergency or urgent care – and, as appropriate, health insurance coverage.
- (b) If an enrolled pregnant woman does not have a source of ongoing care as described in paragraph (a) of this section and, as appropriate, health insurance coverage, a program must, as quickly as possible, facilitate her access to such a source of care that will meet her needs.
- (c) A program must facilitate the ability of all enrolled pregnant women to access comprehensive services through referrals that, at a minimum, include nutritional counseling, food assistance, oral health care, mental health services, substance abuse prevention and treatment, and emergency shelter or transitional housing in cases of domestic violence.
- (d) A program must provide a newborn visit with each mother and baby to offer support and identify family needs. A program must schedule the newborn visit within two weeks after the infant's birth.

### **§1302.81 Prenatal and postpartum information, education, and services.**

- (a) A program must provide enrolled pregnant women, fathers, and partners or other relevant family members the prenatal and postpartum information, education and services that address, as appropriate, fetal development, the importance of nutrition, the risks of alcohol, drugs, and smoking, labor and delivery, postpartum recovery, parental depression, infant care and safe sleep practices, and the benefits of breastfeeding.
- (b) A program must also address needs for appropriate supports for emotional well-being, nurturing and responsive caregiving, and father engagement during pregnancy and early childhood.

### **§1302.82 Family partnership services for enrolled pregnant women.**

- (a) A program must engage enrolled pregnant women and other relevant family members, such as fathers, in the family partnership services as described in §1302.52 and include a specific focus on factors that influence prenatal and postpartum maternal and infant health.
- (b) A program must engage enrolled pregnant women and other relevant family members, such as fathers, in discussions about program options, plan for the infant's transition to program enrollment, and support the family during the transition process, where appropriate.

## Subpart I — Human Resources Management

### §1302.90 Personnel policies.

(a) Establishing personnel policies and procedures. A program must establish written personnel policies and procedures that are approved by the governing body and policy council or policy committee and that are available to all staff.

(b) Background checks and selection procedures.

(1) Before a person is hired, directly or through contract, including transportation staff and contractors, a program must conduct an interview, verify references, conduct a sex offender registry check and obtain one of the following:

(i) State or tribal criminal history records, including fingerprint checks; or,

(ii) Federal Bureau of Investigation criminal history records, including fingerprint checks.

(2) A program has 90 days after an employee is hired to complete the background check process by obtaining:

(i) Whichever check listed in paragraph (b)(1) of this section was not obtained prior to the date of hire; and,

(ii) Child abuse and neglect state registry check, if available.

(3) A program must review the information found in each employment application and complete background check to assess the relevancy of any issue uncovered by the complete background check including any arrest, pending criminal charge, or conviction and must use Child Care and Development Fund (CCDF) disqualification factors described in 42 U.S.C. 9858f(c)(1)(D) and 42 U.S.C. 9858f(h)(1) or tribal disqualifications factors to determine whether the prospective employee can be hired or the current employee must be terminated.

(4) A program must ensure a newly hired employee, consultant, or contractor does not have unsupervised access to children until the complete background check process described in paragraphs (b)(1) through (3) of this section is complete.

(5) A program must conduct the complete background check for each employee, consultant, or contractor at least once every five years which must include each of the four checks listed in paragraphs (b)(1) and (2) of this section, and review and make employment decisions based on the information as described in paragraph (b)(3) of this section, unless the program can demonstrate to the responsible HHS official that it has a more stringent system in place that will ensure child safety.

(6) A program must consider current and former program parents for employment vacancies for which such parents apply and are qualified.

(c) Standards of conduct.

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(1) A program must ensure all staff, consultants, contractors, and volunteers abide by the program's standards of conduct that:

(i) Ensure staff, consultants, contractors, and volunteers implement positive strategies to support children's well-being and prevent and address challenging behavior;

(ii) Ensure staff, consultants, contractors, and volunteers do not maltreat or endanger the health or safety of children, including, at a minimum, that staff must not:

(A) Use 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, or humiliate 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 profane, sarcastic language, threats, or derogatory remarks about the child or child's family; or,

(I) Use physical activity or outdoor time as a punishment or reward;

(iii) Ensure staff, consultants, contractors, and volunteers respect and promote the unique identity of each child and family and do not stereotype on any basis, including gender, race, ethnicity, culture, religion, disability, sexual orientation, or family composition;

(iv) Require staff, consultants, contractors, and volunteers to comply with program confidentiality policies concerning personally identifiable information about children, families, and other staff members in accordance with subpart C of part 1303 of this chapter and applicable federal, state, local, and tribal laws; and,

(v) Ensure no child is left alone or unsupervised by staff, consultants, contractors, or volunteers while under their care.

(2) Personnel policies and procedures must include appropriate penalties for staff, consultants, and volunteers who violate the standards of conduct.

(d) Communication with dual language learners and their families.

(1) A program must ensure staff and program consultants or contractors are familiar with the ethnic backgrounds and heritages of families in the program and are able to serve and effectively communicate, either directly or through interpretation and translation, with children who are dual language learners and to the extent feasible, with families with limited English proficiency.

- (2) If a majority of children in a class or home-based program speak the same language, at least one class staff member or home visitor must speak such language.

## **§ 1302.91 Staff qualifications and competency requirements.**

- (a) Purpose. A program must ensure all staff, consultants, and contractors engaged in the delivery of program services have sufficient knowledge, training and experience, and competencies to fulfill the roles and responsibilities of their positions and to ensure high-quality service delivery in accordance with the program performance standards. A program must provide ongoing training and professional development to support staff in fulfilling their roles and responsibilities.
- (b) Early Head Start or Head Start director. A program must ensure an Early Head Start or Head Start director hired after November 7, 2016, has, at a minimum, a baccalaureate degree and experience in supervision of staff, fiscal management, and administration.
- (c) Fiscal officer. A program must assess staffing needs in consideration of the fiscal complexity of the organization and applicable financial management requirements and secure the regularly scheduled or ongoing services of a fiscal officer with sufficient education and experience to meet their needs. A program must ensure a fiscal officer hired after November 7, 2016, is a certified public accountant or has, at a minimum, a baccalaureate degree in accounting, business, fiscal management, or a related field.
- (d) Child and family services management staff qualification requirements.
- (1) Family, health, and disabilities management. A program must ensure staff responsible for management and oversight of family services, health services, and services to children with disabilities hired after November 7, 2016 have, at a minimum, a baccalaureate degree, preferably related to one or more of the disciplines they oversee.
- (2) Education management. As prescribed in section 648A(a)(2)(B)(i) of the Act, a program must ensure staff and consultants that serve as education managers or coordinators, including those that serve as curriculum specialists, have a baccalaureate or advanced degree in early childhood education or a baccalaureate or advanced degree and equivalent coursework in early childhood education with early education teaching experience.
- (e) Child and family services staff.
- (1) Early Head Start center-based teacher qualification requirements. As prescribed in section 645A(h) of the Act, a program must ensure center-based teachers that provide direct services to infants and toddlers in Early Head Start centers have a **minimum** of a Child Development Associate (CDA) credential or comparable credential, and have been trained or have equivalent coursework in early childhood development with a focus on infant and toddler development.
- (2) Head Start center-based teacher qualification requirements.
- (i) The Secretary must ensure no less than fifty percent of all Head Start teachers, nationwide, have a baccalaureate degree in child development, early childhood education, or equivalent coursework.

- (ii) As prescribed in section 648A(a)(3)(B) of the Act, a program must ensure all center-based teachers have at least an associate's or bachelor's degree in child development or early childhood education, equivalent coursework, or otherwise meet the requirements of section 648A(a)(3)(B) of the Act.
- (3) Head Start assistant teacher qualification requirements. As prescribed in section 648A(a)(2)(B)(ii) of the Act, a program must ensure Head Start assistant teachers, at a minimum, have a CDA credential or a state-awarded certificate that meets or exceeds the requirements for a CDA credential, are enrolled in a program that will lead to an associate or baccalaureate degree or, are enrolled in a CDA credential program to be completed within two years of the time of hire.
- (4) Family child care provider qualification requirements.
- (i) A program must ensure family child care providers have previous early child care experience and, at a minimum, are enrolled in a Family Child Care CDA program or state equivalent, or an associate's or baccalaureate degree program in child development or early childhood education prior to beginning service provision, and for the credential acquire it within eighteen months of beginning to provide services.
- (ii) By August 1, 2018, a child development specialist, as required for family child care in §1302.23(e), must have, at a minimum, a baccalaureate degree in child development, early childhood education, or a related field.
- (5) Center-based teachers, assistant teachers, and family child care provider competencies. A program must ensure center-based teachers, assistant teachers, and family child care providers demonstrate competency to provide effective and nurturing teacher-child interactions, plan and implement learning experiences that ensure effective curriculum implementation and use of assessment and promote children's progress across the standards described in the Head Start Early Learning Outcomes Framework: Ages Birth to Five and applicable state early learning and development standards, including for children with disabilities and dual language learners, as appropriate.
- (6) Home visitors. A program must ensure home visitors providing home-based education services:
- (i) Have a minimum of a home-based CDA credential or comparable credential, or equivalent coursework as part of an associate's or bachelor's degree; and,
- (ii) Demonstrate competency to plan and implement home-based learning experiences that ensure effective implementation of the home visiting curriculum and promote children's progress across the standards described in the Head Start Early Learning Outcomes Framework: Ages Birth to Five, including for children with disabilities and dual language learners, as appropriate, and to build respectful, culturally responsive, and trusting relationships with families.
- (7) Family services staff qualification requirements. A program must ensure staff who work directly with families on the family partnership process hired after November 7, 2016, have

within eighteen months of hire, at a minimum, a credential or certification in social work, human services, family services, counseling or a related field.

(8) Health professional qualification requirements.

(i) A program must ensure health procedures are performed only by a licensed or certified health professional.

(ii) A program must ensure all mental health consultants are licensed or certified mental health professionals. A program must use mental health consultants with knowledge of and experience in serving young children and their families, if available in the community.

(iii) A program must use staff or consultants to support nutrition services who are registered dietitians or nutritionists with appropriate qualifications.

(f) Coaches. A program must ensure coaches providing the services described in 1302.92(c) have a minimum of a baccalaureate degree in early childhood education or a related field.

### **§1302.92 Training and professional development.**

(a) A program must provide to all new staff, consultants, and volunteers an orientation that focuses on, at a minimum, the goals and underlying philosophy of the program and on the ways they are implemented.

(b) A program must establish and implement a systematic approach to staff training and professional development designed to assist staff in acquiring or increasing the knowledge and skills needed to provide high-quality, comprehensive services within the scope of their job responsibilities, and attached to academic credit as appropriate. At a minimum, the system must include:

(1) Staff completing a minimum of 15 clock hours of professional development per year. For teaching staff, such professional development must meet the requirements described in section 648A(a)(5) of the Act.

(2) Training on methods to handle suspected or known child abuse and neglect cases, that comply with applicable federal, state, local, and tribal laws;

(3) Training for child and family services staff on best practices for implementing family engagement strategies in a systemic way, as described throughout this part;

(4) Training for child and family services staff, including staff that work on family services, health, and disabilities, that builds their knowledge, experience, and competencies to improve child and family outcomes; and,

(5) Research-based approaches to professional development for education staff, that are focused on effective curricula implementation, knowledge of the content in Head Start Early Learning Outcomes Framework: Ages Birth to Five, partnering with families, supporting children with disabilities and their families, providing effective and nurturing adult-child interactions, supporting dual language learners as appropriate, addressing challenging behaviors,

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preparing children and families for transitions (as described in subpart G of this part), and use of data to individualize learning experiences to improve outcomes for all children.

(c) A program must implement a research-based, coordinated coaching strategy for education staff that:

(1) Assesses all education staff to identify strengths, areas of needed support, and which staff would benefit most from intensive coaching;

(2) At a minimum, provides opportunities for intensive coaching to those education staff identified through the process in paragraph (c)(1) of this section, including opportunities to be observed and receive feedback and modeling of effective teacher practices directly related to program performance goals;

(3) At a minimum, provides opportunities for education staff not identified for intensive coaching through the process in paragraph (c)(1) of this section to receive other forms of research-based professional development aligned with program performance goals;

(4) Ensures intensive coaching opportunities for the staff identified through the process in paragraph (c)(1) of this section that:

(i) Align with the program's school readiness goals, curricula, and other approaches to professional development;

(ii) Utilize a coach with adequate training and experience in adult learning and in using assessment data to drive coaching strategies aligned with program performance goals;

(iii) Provide ongoing communication between the coach, program director, education director, and any other relevant staff; and,

(iv) Include clearly articulated goals informed by the program's goals, as described in §1302.102, and a process for achieving those goals; and,

(5) Establishes policies that ensure assessment results are not used to solely determine punitive actions for staff identified as needing support, without providing time and resources for staff to improve.

(d) If a program needs to develop or significantly adapt their approach to research-based professional development to better meet the training needs of education staff, such that it does not include the requirements in paragraph (c) of this section, the program must partner with external early childhood education professional development experts. A program must assess whether the adaptation adequately supports staff professional development, consistent with the process laid out in subpart J of this part.

### **§1302.93 Staff health and wellness.**

(a) A program must ensure each staff member has an initial health examination and a periodic re-examination as recommended by their health care provider in accordance with state, tribal, or local requirements, that include screeners or tests for communicable diseases, as appropriate. The program must ensure staff do not, because of communicable diseases, pose a significant risk to the health or

safety of others in the program that cannot be eliminated or reduced by reasonable accommodation, in accordance with the Americans with Disabilities Act and section 504 of the Rehabilitation Act.

(b) A program must make mental health and wellness information available to staff regarding health issues that may affect their job performance, and must provide regularly scheduled opportunities to learn about mental health, wellness, and health education.

### **§1302.94 Volunteers.**

(a) A program must ensure regular volunteers have been screened for appropriate communicable diseases in accordance with state, tribal or local laws. In the absence of state, tribal or local law, the Health Services Advisory Committee must be consulted regarding the need for such screenings.

(b) A program must ensure children are never left alone with volunteers.

## **Subpart J — Program Management and Quality Improvement**

### **§1302.100 Purpose.**

A program must provide management and a process of ongoing monitoring and continuous improvement for achieving program goals that ensures child safety and the delivery of effective, high-quality program services.

### **§1302.101 Management system.**

(a) Implementation. A program must implement a management system that:

- (1) Ensures a program, fiscal, and human resource management structure that provides effective management and oversight of all program areas and fiduciary responsibilities to enable delivery of high-quality services in all of the program services described in subparts C, D, E, F, G, and H of this part;
- (2) Provides regular and ongoing supervision to support individual staff professional development and continuous program quality improvement;
- (3) Ensures budget and staffing patterns that promote continuity of care for all children enrolled, allow sufficient time for staff to participate in appropriate training and professional development, and allow for provision of the full range of services described in subparts C, D, E, F, G, and H of this part; and,
- (4) Maintains an automated accounting and record keeping system adequate for effective oversight.

(b) Coordinated approaches. At the beginning of each program year, and on an ongoing basis throughout the year, a program must design and implement program-wide coordinated approaches that ensure:

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- (1) The training and professional development system, as described in §1302.92, effectively supports the delivery and continuous improvement of high-quality services;
- (2) The full and effective participation of children who are dual language learners and their families, by
- (i) Utilizing information from the program's community assessment about the languages spoken throughout the program service area to anticipate child and family needs;
  - (ii) Identifying community resources and establishing ongoing collaborative relationships and partnerships with community organizations consistent with the requirements in §1302.53(a); and,
  - (iii) Systematically and comprehensively addressing child and family needs by facilitating meaningful access to program services, including, at a minimum, curriculum, instruction, staffing, supervision, and family partnerships with bilingual staff, oral language assistance and interpretation, or translation of essential program materials, as appropriate.
- (3) The full and effective participation of all children with disabilities, including but not limited to children eligible for services under IDEA, by providing services with appropriate facilities, program materials, curriculum, instruction, staffing, supervision, and partnerships, at a minimum, consistent with section 504 of the Rehabilitation Act and the Americans with Disabilities Act; and,
- (4) The management of program data to effectively support the availability, usability, integrity, and security of data. A program must establish procedures on data management, and have them approved by the governing body and policy council, in areas such as quality of data and effective use and sharing of data, while protecting the privacy of child records in accordance with subpart C of part 1303 of this chapter and applicable federal, state, local, and tribal laws.

## **§1302.102 Achieving program goals.**

- (a) Establishing program goals. A program, in collaboration with the governing body and policy council, must establish goals and measurable objectives that include:
- (1) Strategic long-term goals for ensuring programs are and remain responsive to community needs as identified in their community assessment as described in subpart A of this part;
  - (2) Goals for the provision of educational, health, nutritional, and family and community engagement program services as described in the program performance standards to further promote the school readiness of enrolled children;
  - (3) School readiness goals that are aligned with the Head Start Early Learning Outcomes Framework: Ages Birth to Five, state and tribal early learning standards, as appropriate, and requirements and expectations of schools Head Start children will attend, per the requirements of subpart B of part 1304 of this part; and,
  - (4) Effective health and safety practices to ensure children are safe at all times, per the require-

ments in §§1302.47, 1302.90(b) and (c), 1302.92(c)(1), and 1302.94 and part 1303 subpart F, of this chapter.

(b) Monitoring program performance.

(1) Ongoing compliance oversight and correction. In order to ensure effective ongoing oversight and correction, a program must establish and implement a system of ongoing oversight that ensures effective implementation of the program performance standards, including ensuring child safety, and other applicable federal regulations as described in this part, and must:

- (i) Collect and use data to inform this process;
- (ii) Correct quality and compliance issues immediately, or as quickly as possible;
- (iii) Work with the governing body and the policy council to address issues during the ongoing oversight and correction process and during federal oversight; and,
- (iv) Implement procedures that prevent recurrence of previous quality and compliance issues, including previously identified deficiencies, safety incidents, and audit findings.

(2) Ongoing assessment of program goals. A program must effectively oversee progress towards program goals on an ongoing basis and annually must:

- (i) Conduct a self-assessment that uses program data including aggregated child assessment data, and professional development and parent and family engagement data as appropriate, to evaluate the program's progress towards meeting goals established under paragraph (a) of this section, compliance with program performance standards throughout the program year, and the effectiveness of the professional development and family engagement systems in promoting school readiness;
- (ii) Communicate and collaborate with the governing body and policy council, program staff, and parents of enrolled children when conducting the annual self-assessment; and,
- (iii) Submit findings of the self-assessment, including information listed in paragraph (b) (2)(i) of this section to the responsible HHS official.

(c) Using data for continuous improvement.

(1) A program must implement a process for using data to identify program strengths and needs, develop and implement plans that address program needs, and continually evaluate compliance with program performance standards and progress towards achieving program goals described in paragraph (a) of this section.

(2) This process must:

- (i) Ensure data is aggregated, analyzed and compared in such a way to assist agencies in identifying risks and informing strategies for continuous improvement in all program service areas;
- (ii) Ensure child-level assessment data is aggregated and analyzed at least three times a year, including for sub-groups, such as dual language learners and children with disabil-

ities, as appropriate, except in programs operating fewer than 90 days, and used with other program data described in paragraph (c)(2)(iv) of this section to direct continuous improvement related to curriculum choice and implementation, teaching practices, professional development, program design and other program decisions, including changing or targeting scope of services; and,

(iii) For programs operating fewer than 90 days, ensures child assessment data is aggregated and analyzed at least twice during the program operating period, including for subgroups, such as dual language learners and children with disabilities, as appropriate, and used with other program data described in paragraph (c)(2)(iv) of this section to direct continuous improvement related to curriculum choice and implementation, teaching practices, professional development, program design and other program decisions, including changing or targeting scope of services;

(iv) Use information from ongoing monitoring and the annual self-assessment, and program data on teaching practice, staffing and professional development, child-level assessments, family needs assessments, and comprehensive services, to identify program needs, and develop and implement plans for program improvement; and,

(v) Use program improvement plans as needed to either strengthen or adjust content and strategies for professional development, change program scope and services, refine school readiness and other program goals, and adapt strategies to better address the needs of sub-groups.

(d) Reporting:

(1) A program must submit:

(i) Status reports, determined by ongoing oversight data, to the governing body and policy council, at least semi-annually;

(ii) Reports, as appropriate, to the responsible HHS official immediately or as soon as practicable, related to any significant incidents affecting the health and safety of program participants, circumstances affecting the financial viability of the program, breaches of personally identifiable information, or program involvement in legal proceedings, any matter for which notification or a report to state, tribal, or local authorities is required by applicable law, including at a minimum:

(A) Any reports regarding agency staff or volunteer compliance with federal, state, tribal, or local laws addressing child abuse and neglect or laws governing sex offenders;

(B) Incidents that require classrooms or centers to be closed for any reason;

(C) Legal proceedings by any party that are directly related to program operations; and,

(D) All conditions required to be reported under §1304.12, including disqualification from the Child and Adult Care Food Program (CACFP) and license revocation.

(2) Annually, a program must publish and disseminate a report that complies with section 644(a)(2) of the Act and includes a summary of a program's most recent community assessment, as described in §1302.11(b), consistent with privacy protections in subpart C of part 1303 of this chapter.

(3) If a program has had a deficiency identified, it must submit, to the responsible HHS official, a quality improvement plan as required in section 641A(e)(2) of the Act.

### **§1302.103 Implementation of program performance standards.**

(a) A current program at of November 7, 2016, must implement a program-wide approach for the effective and timely implementation of the changes to the program performance standards, including the purchase of materials and allocation of staff time, as appropriate.

(b) A program's approach to implement the changes included in parts 1301 through 1304 of this chapter must ensure adequate preparation for effective and timely service delivery to children and their families including, at a minimum, review of community assessment data to determine the most appropriate strategy for implementing required program changes, including assessing any changes in the number of children who can be served, as necessary, the purchase of and training on any curriculum, assessment, or other materials, as needed, assessment of program-wide professional development needs, assessment of staffing patterns, the development of coordinated approaches described in §1302.101(b), and the development of appropriate protections for data sharing; and children enrolled in the program on November 7, 2016 are not displaced during a program year and that children leaving Early Head Start or Head Start at the end of the program year following November 7, 2016 as a result of any slot reductions received services described in §§1302.70 and 1302.72 to facilitate successful transitions to other programs.

## **Part 1303 — Financial and Administrative Requirements**

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AUTHORITY: 42 U.S.C. 9801 *et seq.*

## **§1303.1 Overview.**

Section 641A of the Act requires that the Secretary modify as necessary program performance standards including administrative and financial management standards (section 641A(a)(1)(C)). This part specifies the financial and administrative requirements of agencies. Subpart A of this part outlines the financial requirements consistent with sections 640(b) and 644(b) and (c) of the Act. Subpart B of this part specifies the administrative requirements consistent with sections 644(a)(1),

644(e), 653, 654, 655, 656, and 657A of the Act. Subpart C of this part implements the statutory provision at section 641A(b)(4) of the Act that directs the Secretary to ensure the confidentiality of any personally identifiable data, information, and records collected or maintained. Subpart D of this part prescribes regulations for the operation of delegate agencies consistent with Section 641(A)(d). Subpart E of this part implements the statutory requirements in Section 644(c), (f) and (g) related to facilities. Subpart F prescribes regulations on transportation consistent with section 640(i) of the Act.

## Subpart A — Financial Requirements

### §1303.2 Purpose.

This subpart establishes regulations applicable to program administration and grants management for all grants under the Act.

### §1303.3 Other requirements.

The following chart includes HHS regulations that apply to all grants made under the Act:

Cite	Title
45 CFR part 16	Department grant appeals process
45 CFR part 30	HHS Standards and Procedures for Claims collection
45 CFR part 46	Protection of human subjects
45 CFR part 75	Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
45 CFR part 80	Nondiscrimination under programs receiving federal assistance through the Department of Health and Human Services- Effectuation of title VI and VII of the Civil Rights Act of 1964
45 CFR part 81	Practice and procedure for hearings under part 80
45 CFR part 84	Nondiscrimination on the basis of handicap in federally assisted programs
45 CFR part 87	Equal treatment for faith based organizations
2 CFR part 170	FFATA Sub-award and executive compensation
2 CFR 25.110	CCR/DUNS requirement

### §1303.4 Federal financial assistance, non-federal match, and waiver requirements.

In accordance with section 640(b) of the Act, federal financial assistance to a grantee will not exceed 80 percent of the approved total program costs. A grantee must contribute 20 percent as non-federal match each budget period. The responsible HHS official may approve a waiver of all or a portion of the non-federal match requirement on the basis of the grantee’s written application submitted for the budget period and any supporting evidence the responsible HHS official requires. In deciding

whether to grant a waiver, the responsible HHS official will consider the circumstances specified at section 640(b) of the Act and whether the grantee has made a reasonable effort to comply with the non-federal match requirement.

### **§ 1303.5 Limitations on development and administrative costs.**

(a) Limitations.

(1) Costs to develop and administer a program cannot be excessive or exceed 15 percent of the total approved program costs. Allowable costs to develop and administer a Head Start program cannot exceed 15 percent of the total approved program costs, which includes both federal costs and non-federal match, unless the responsible HHS official grants a waiver under paragraph (b) of this section that approves a higher percentage in order to carry out the purposes of the Act.

(2) To assess total program costs and determine whether a grantee meets this requirement, the grantee must:

(i) Determine the costs to develop and administer its program, including the local costs of necessary resources;

(ii) Categorize total costs as development and administrative or program costs;

(iii) Identify and allocate the portion of dual benefits costs that are for development and administration;

(iv) Identify and allocate the portion of indirect costs that are for development and administration versus program costs; and,

(v) Delineate all development and administrative costs in the grant application and calculate the percentage of total approved costs allocated to development and administration.

(b) Waivers.

(1) The responsible HHS official may grant a waiver for each budget period if a delay or disruption to program services is caused by circumstances beyond the agency's control, or if an agency is unable to administer the program within the 15 percent limitation and if the agency can demonstrate efforts to reduce its development and administrative costs.

(2) If at any time within the grant funding cycle, a grantee estimates development and administration costs will exceed 15 percent of total approved costs, it must submit a waiver request to the responsible HHS official that explains why costs exceed the limit, that indicates the time period the waiver will cover, and that describes what the grantee will do to reduce its development and administrative costs to comply with the 15 percent limit after the waiver period.

## **Subpart B — Administrative Requirements**

### **§1303.10 Purpose.**

A grantee must observe standards of organization, management, and administration that will ensure, so far as reasonably possible, that all program activities are conducted in a manner consistent with the purposes of the Act and the objective of providing assistance effectively, efficiently, and free of any taint of partisan political bias or personal or family favoritism.

### **§1303.11 Limitations and prohibitions.**

An agency must adhere to sections 644(e), 644(g)(3), 653, 654, 655, 656, and 657A of the Act. These sections pertain to union organizing, the Davis-Bacon Act, limitations on compensation, non-discrimination, unlawful activities, political activities, and obtaining parental consent.

### **§1303.12 Insurance and bonding.**

An agency must have an ongoing process to identify risks and have cost-effective insurance for those identified risks; a grantee must require the same for its delegates. The agency must specifically consider the risk of accidental injury to children while participating in the program. The grantee must submit proof of appropriate coverage in its initial application for funding. The process of identifying risks must also consider the risk of losses resulting from fraudulent acts by individuals authorized to disburse Head Start funds. Consistent with 45 CFR part 75, if the agency lacks sufficient coverage to protect the federal government's interest, the agency must maintain adequate fidelity bond coverage.

## **Subpart C — Protections for the Privacy of Child Records**

### **§1303.20 Establishing procedures.**

A program must establish procedures to protect the confidentiality of any personally identifiable information (PII) in child records.

### **§1303.21 Program procedures – applicable confidentiality provisions.**

- (a) If a program is an educational agency or institution that receives funds under a program administered by the Department of Education and therefore is subject to the confidentiality provisions under the Family Educational Rights and Privacy Act (FERPA), then it must comply with those confidentiality provisions of FERPA instead of the provisions in this subpart.
- (b) If a program serves a child who is referred to, or found eligible for services under, IDEA, then a program must comply with the applicable confidentiality provisions in Part B or Part C of IDEA to protect the PII in records of those children, and, therefore, the provisions in this subpart do not apply to those children.

## §1303.22 Disclosures with, and without, parental consent.

### (a) Disclosure with parental consent.

(1) Subject to the exceptions in paragraphs (b) and (c) of this section, the procedures to protect PII must require the program to obtain a parent’s written consent before the program may disclose such PII from child records.

(2) The procedures to protect PII must require the program to ensure the parent’s written consent specifies what child records may be disclosed, explains why the records will be disclosed, and identifies the party or class of parties to whom the records may be disclosed. The written consent must be signed and dated.

(3) “Signed and dated written consent” under this part may include a record and signature in electronic form that:

- (i) Identifies and authenticates a particular person as the source of the electronic consent; and,
- (ii) Indicates such person's approval of the information.

(4) The program must explain to the parent that the granting of consent is voluntary on the part of the parent and may be revoked at any time. If a parent revokes consent, that revocation is not retroactive and therefore it does not apply to an action that occurred before the consent was revoked.

(b) Disclosure without parental consent but with parental notice and opportunity to refuse. The procedures to protect PII must allow the program to disclose such PII from child records without parental consent if the program notifies the parent about the disclosure, provides the parent, upon the parent’s request, a copy of the PII from child records to be disclosed in advance, and gives the parent an opportunity to challenge and refuse disclosure of the information in the records, before the program forwards the records to officials at a program, school, or school district in which the child seeks or intends to enroll or where the child is already enrolled so long as the disclosure is related to the child's enrollment or transfer.

(c) Disclosure without parental consent. The procedures to protect PII must allow the program to disclose such PII from child records without parental consent to:

- (1) Officials within the program or acting for the program, such as contractors and subrecipients, if the official provides services for which the program would otherwise use employees, the program determines it is necessary for Head Start services, and the program maintains oversight with respect to the use, further disclosure, and maintenance of child records, such as through a written agreement;
- (2) Officials within the program, acting for the program, or from a federal or state entity, in connection with an audit or evaluation of education or child development programs, or for enforcement of or compliance with federal legal requirements of the program; provided the program maintains oversight with respect to the use, further disclosure, and maintenance of child records, such as through a written agreement, including the destruction of the PII when

no longer needed for the purpose of the disclosure, except when the disclosure is specifically authorized by federal law or by the responsible HHS official;

(3) Officials within the program, acting for the program, or from a federal or state entity, to conduct a study to improve child and family outcomes, including improving the quality of programs, for, or on behalf of, the program, provided the program maintains oversight with respect to the use, further disclosure, and maintenance of child records, such as through a written agreement, including the destruction of the PII when no longer needed for the purpose of the disclosure;

(4) Appropriate parties in order to address a disaster, health or safety emergency during the period of the emergency, or a serious health and safety risk such as a serious food allergy, if the program determines that disclosing the PII from child records is necessary to protect the health or safety of children or other persons;

(5) Comply with a judicial order or lawfully issued subpoena, provided the program makes a reasonable effort to notify the parent about all such subpoenas and court orders in advance of the compliance therewith, unless:

- (i) A court has ordered that neither the subpoena, its contents, nor the information provided in response be disclosed;
- (ii) The disclosure is in compliance with an ex parte court order obtained by the United States Attorney General (or designee not lower than an Assistant Attorney General) concerning investigations or prosecutions of an offense listed in 18 U.S.C. 2332b(g)(5)(B) or an act of domestic or international terrorism as defined in 18 U.S.C. 2331.
- (iii) A parent is a party to a court proceeding directly involving child abuse and neglect (as defined in section 3 of the Child Abuse Prevention and Treatment Act (42 U.S.C. 5101)) or dependency matters, and the order is issued in the context of that proceeding, additional notice to the parent by the program is not required; or,
- (iv) A program initiates legal action against a parent or a parent initiates legal action against a program, then a program may disclose to the court, also without a court order or subpoena, the child records relevant for the program to act as plaintiff or defendant.

(6) The Secretary of Agriculture or an authorized representative from the Food and Nutrition Service to conduct program monitoring, evaluations, and performance measurements for the Child and Adult Care Food Program under the Richard B. Russell National School Lunch Act or the Child Nutrition Act of 1966, if the results will be reported in an aggregate form that does not identify any individual: provided, that any data collected must be protected in a manner that will not permit the personal identification of students and their parents by other than the authorized representatives of the Secretary of Agriculture and any PII must be destroyed when the data are no longer needed for program monitoring, evaluations, and performance measurements;

(7) A caseworker or other representative from a state, local, or tribal child welfare agency, who has the right to access a case plan for a child who is in foster care placement, when such agency is legally responsible for the child's care and protection, under state or tribal law, if the agen-

cy agrees in writing to protect PII, to use information from the child's case plan for specific purposes intended of addressing the child's needs, and to destroy information that is no longer needed for those purposes; and,

(8) Appropriate parties in order to address suspected or known child maltreatment and is consistent with applicable federal, state, local, and tribal laws on reporting child abuse and neglect.

(d) Written agreements. When a program establishes a written agreement with a third party, the procedures to protect such PII must require the program to annually review and, if necessary, update the agreement. If the third party violates the agreement, then the program may:

(1) Provide the third party an opportunity to self-correct; or,

(2) Prohibit the third party from access to records for a set period of time as established by the programs governing body and policy council.

(e) Annual notice. The procedures to protect PII must require the program to annually notify parents of their rights in writing described in this subpart and applicable definitions in part 1305 of this chapter, and include in that notice a description of the types of PII that may be disclosed, to whom the PII may be disclosed, and what may constitute a necessary reason for the disclosure without parental consent as described in paragraph (c) of this section.

(f) Limit on disclosing PII. A program must only disclose the information that is deemed necessary for the purpose of the disclosure.

## **§1303.23 Parental rights.**

(a) Inspect record.

(1) A parent has the right to inspect child records.

(2) If the parent requests to inspect child records, the program must make the child records available within a reasonable time, but no more than 45 days after receipt of request.

(3) If a program maintains child records that contain information on more than one child, the program must ensure the parent only inspects information that pertains to the parent's child.

(4) The program shall not destroy a child record with an outstanding request to inspect and review the record under this section.

(b) Amend record.

(1) A parent has the right to ask the program to amend information in the child record that the parent believes is inaccurate, misleading, or violates the child's privacy.

(2) The program must consider the parent's request and, if the request is denied, render a written decision to the parent within a reasonable time that informs the parent of the right to a hearing.

(c) Hearing.

(1) If the parent requests a hearing to challenge information in the child record, the program must schedule a hearing within a reasonable time, notify the parent, in advance, about the hearing, and ensure the person who conducts the hearing does not have a direct interest in its outcome.

(2) The program must ensure the hearing affords the parent a full and fair opportunity to present evidence relevant to the issues.

(3) If the program determines from evidence presented at the hearing that the information in the child records is inaccurate, misleading, or violates the child's privacy, the program must either amend or remove the information and notify the parent in writing.

(4) If the program determines from evidence presented at the hearing that information in the child records is accurate, does not mislead, or otherwise does not violate the child's privacy, the program must inform the parent of the right to place a statement in the child records that either comments on the contested information, or that states why the parent disagrees with the program's decision, or both.

(d) Right to copy of record. The program must provide a parent, free of charge, an initial copy of child records disclosed to third parties with parental consent and, upon parent request, an initial copy of child records disclosed to third parties, unless the disclosure was for a court that ordered neither the subpoena, its contents, nor the information furnished in response be disclosed.

(e) Right to inspect written agreements. A parent has the right to review any written agreements with third parties.

### **§1303.24 Maintaining records.**

(a) A program must maintain child records in a manner that ensures only parents, and officials within the program or acting on behalf of the program have access, and such records must be destroyed within a reasonable timeframe after such records are no longer needed or required to be maintained.

(b) A program must maintain, with the child records, for as long as the records are maintained, information on all individuals, agencies, or organizations to whom a disclosure of PII from the child records was made (except for program officials and parents) and why the disclosure was made. If a program uses a web-based data system to maintain child records, the program must ensure such child records are adequately protected and maintained according to current industry security standards.

(c) If a parent places a statement in the child record, the program must maintain the statement with the contested part of the child record for as long as the program maintains the record and, disclose the statement whenever it discloses the portion of the child record to which the statement relates.

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## Subpart D — Delegation of Program Operations

### §1303.30 Grantee responsibility and accountability.

A grantee is accountable for the services its delegate agencies provide. The grantee supports, oversees and ensures delegate agencies provide high-quality services to children and families and meet all applicable Head Start requirements. The grantee can only terminate a delegate agency if the grantee shows cause why termination is necessary and provides a process for delegate agencies to appeal termination decisions. The grantee retains legal responsibility and authority and bears financial accountability for the program when services are provided by delegate agencies.

### §1303.31 Determining and establishing delegate agencies.

- (a) If a grantee enters into an agreement with another entity to serve children, the grantee must determine whether the agreement meets the definition of “delegate agency” in section 637(3) of the Act.
- (b) A grantee must not award a delegate agency federal financial assistance unless there is a written agreement and the responsible HHS official approves the agreement before the grantee delegates program operations.

### §1303.32 Evaluations and corrective actions for delegate agencies.

A grantee must evaluate and ensure corrective action for delegate agencies according to section 641A(d) of the Act.

### §1303.33 Termination of delegate agencies.

- (a) If a grantee shows cause why termination is appropriate or demonstrates cost effectiveness, the grantee may terminate a delegate agency’s contract.
- (b) The grantee’s decision to terminate must not be arbitrary or capricious.
- (c) The grantee must establish a process for defunding a delegate agency, including an appeal of a defunding decision and must ensure the process is fair and timely.
- (d) The grantee must notify the responsible HHS official about the appeal and its decision.

## Subpart E — Facilities

### §1303.40 Purpose.

This subpart prescribes what a grantee must establish to show it is eligible to purchase, construct and renovate facilities as outlined in section 644(c), (f) and (g) of the Act. It explains how a grantee may apply for funds, details what measures a grantee must take to protect federal interest in facilities

purchased, constructed or renovated with grant funds, and concludes with other administrative provisions. This subpart applies to major renovations. It only applies to minor renovations and repairs, when they are included with a purchase application and are part of purchase costs.

### **§1303.41 Approval of previously purchased facilities.**

If a grantee purchased a facility after December 31, 1986, and seeks to use grant funds to continue to pay purchase costs for the facility or to refinance current indebtedness and use grant funds to service the resulting debt, the grantee may apply for funds to meet those costs. The grantee must submit an application that conforms to requirements in this part and in the Act to the responsible HHS official. If the responsible HHS official approves the grantee's application, Head Start funds may be used to pay ongoing purchase costs, which include principal and interest on approved loans.

### **§1303.42 Eligibility to purchase, construct, and renovate facilities.**

#### **(a) Preliminary eligibility.**

(1) Before a grantee can apply for funds to purchase, construct, or renovate a facility under §1303.44, it must establish that:

- (i) The facility will be available to Indian tribes, or rural or other low-income communities;
- (ii) The proposed purchase, construction or major renovation is within the grantee's designated service area; and,
- (iii) The proposed purchase, construction or major renovation is necessary because the lack of suitable facilities in the grantee's service area will inhibit the operation of the program.

(2) If a program applies to construct a facility, that the construction of such facility is more cost-effective than the purchase of available facilities or renovation.

(b) Proving a lack of suitable facilities. To satisfy paragraph (a)(1)(iii) of this section, the grantee must have a written statement from an independent real estate professional familiar with the commercial real estate market in the grantee's service area, that includes factors considered and supports how the real estate professional determined there are no other suitable facilities in the area.

### **§1303.43 Use of grant funds to pay fees.**

A grantee may submit a written request to the responsible HHS official for reasonable fees and costs necessary to determine preliminary eligibility under §1303.42 before it submits an application under §1303.44. If the responsible HHS official approves the grantee's application, the grantee may use federal funds to pay fees and costs.

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## §1303.44 Applications to purchase, construct, and renovate facilities.

(a) Application requirements. If a grantee is preliminarily eligible under §1303.42 to apply for funds to purchase, construct, or renovate a facility, it must submit to the responsible HHS official:

- (1) A statement that explains the anticipated effect the proposed purchase, construction or renovation has had or will have on program enrollment, activities and services, and how it determined what the anticipated effect would be;
- (2) A deed or other document showing legal ownership of the real property where facilities activity is proposed, legal description of the facility site, and an explanation why the location is appropriate for the grantee's service area;
- (3) Plans and specifications for the facility, including square footage, structure type, the number of rooms the facility will have or has, how the rooms will be used, where the structure will be positioned or located on the building site, and whether there is space available for outdoor play and for parking;
- (4) Certification by a licensed engineer or architect that the facility is, or will be upon completion, structurally sound and safe for use as a Head Start facility and that the facility complies, or will comply upon completion, with local building codes, applicable child care licensing requirements, the accessibility requirements of the Americans with Disabilities Act, section 504 of the Rehabilitation Act of 1973, the Flood Disaster Protection Act of 1973, and the National Historic Preservation Act of 1966;
- (5) A description of proposed renovations or repairs to make the facility suitable for program activities, and plans and specification that describe the facility after renovation or repair;
- (6) A proposed schedule that details when the grantee will acquire, renovate, repair and occupy the facility;
- (7) An estimate by a licensed independent certified appraiser of the facility's fair market value after proposed purchase and associated repairs and renovations construction, or major renovation is completed is required for all facilities activities except for major renovations to leased property;
- (8) The cost comparison described in §1303.45;
- (9) A statement that shows what share of the purchase, construction, or major renovation will be paid with grant funds and what the grantee proposes to contribute as a nonfederal match to the purchase, construction or major renovation;
- (10) A statement from a lender, if a grantee applies to use Head Start funds to continue purchase on a facility or refinance existing debt on a facility that indicates the lender is willing to comply with §1303.49;
- (11) The terms of any proposed or existing loan(s) related to purchase, construction or major renovation of the facility, including copies of any funding commitment letters, mortgages, promissory notes, potential security agreements to be entered into, information on all other

sources of funding, construction or major renovation, and any restrictions or conditions imposed by other funding sources;

(12) A Phase I environmental site assessment that describes the environmental condition of the proposed facility site and any structures on the site;

(13) A description of the efforts by the grantee to coordinate or collaborate with other providers in the community to seek assistance, including financial assistance, prior to the use of funds under this section; and,

(14) Any additional information the responsible HHS official may require.

(b) Additional requirements for leased properties.

(1) If a grantee applies to renovate leased property, it must submit to the responsible HHS official information described in paragraph (a) of this section, a copy of the existing or proposed lease agreement, and the landlord or lessor's consent.

(2) If a grantee applies to purchase a modular unit it intends to site on leased property or on other property the grantee does not own, the grantee must submit to the responsible HHS official information described in paragraph (a) of this section and a copy of the proposed lease or other occupancy agreement that will allow the grantee access to the modular unit for at least 15 years.

(c) Non-federal match. Any non-federal match associated with facilities activities becomes part of the federal share of the facility.

## **§1303.45 Cost-comparison to purchase, construct, and renovate facilities.**

(a) Cost comparison.

(1) If a grantee proposes to purchase, construct, or renovate a facility, it must submit a detailed cost estimate of the proposed activity, compare the costs associated with the proposed activity to other available alternatives in the service area, and provide any additional information the responsible HHS official requests. The grantee must demonstrate that the proposed activity will result in savings when compared to the costs that would be incurred to acquire the use of an alternative facility to carry out program.

(2) In addition to requirements in paragraph (1) of this section, the grantee must:

(i) Identify who owns the property;

(ii) List all costs related to the purchase, construction, or renovation;

(iii) Identify costs over the structure's useful life, which is at least 20 years for a facility that the grantee purchased or constructed and at least 15 years for a modular unit the grantee renovated, and deferred costs, including mortgage balloon payments, as costs with associated due dates; and,

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(iv) Demonstrate how the proposed purchase, construction, or major renovation is consistent with program management and fiscal goals, community needs, enrollment and program options and how the proposed facility will support the grantee as it provides quality services to children and families.

(b) Continue purchase or refinance. To use funds to continue purchase on a facility or to refinance an existing indebtedness, the grantee must compare the costs of continued purchase against the cost of purchasing a comparable facility in the service area over the remaining years of the facility's useful life. The grantee must demonstrate that the proposed activity will result in savings when compared to the cost that would be incurred to acquire the use of an alternative facility to carry out the program.

(c) Multi-purpose use. If the grantee intends to use a facility to operate a Head Start program and for another purpose, it must disclose what percentage of the facility will be used for non-Head Start activities, along with costs associated with those activities, in accordance with applicable cost principles.

### **§1303.46 Recording and posting notices of federal interest.**

(a) Survival of federal interest. A grantee that receives funds under this subpart must file notices of federal interest as set forth in paragraph (b) of this section. Federal interest cannot be defeated by a grantee's failure to file a notice of federal interest.

(b) Recording notices of federal interest.

(1) If a grantee uses federal funds to purchase real property or a facility, excluding modular units, appurtenant to real property, it must record a notice of federal interest in the official real property records for the jurisdiction where the facility is or will be located. The grantee must file the notice of federal interest as soon as it uses Head Start funds to either fully or partially purchase a facility or real property where a facility will be constructed or as soon as it receives permission from the responsible HHS official to use Head Start funds to continue purchase on a facility.

(2) If a grantee uses federal funds in whole or in part to construct a facility, it must record the notice of federal interest in the official real property records for the jurisdiction in which the facility is located as soon as it receives the notice of award to construct the facility.

(3) If a grantee uses federal funds to renovate a facility that it, or a third party owns, the grantee must record the notice of federal interest in the official real property records for the jurisdiction in which the facility is located as soon as it receives the notice of award to renovate the facility.

(4) If a grantee uses federal funds in whole or in part to purchase a modular unit or to renovate a modular unit, the grantee must post the notice of federal interest, in clearly visible locations, on the exterior of the modular unit and inside the modular unit.

**§1303.47 Contents of notices of federal interest.**

(a) Facility and real property a grantee owns. A notice of federal interest for a facility, other than a modular unit, and real property the grantee owns or will own, must include:

- (1) The grantee's correct legal name and current mailing address;
- (2) A legal description of the real property;
- (3) Grant award number, amount and date of initial facilities funding award or initial use of base grant funds for ongoing purchase or mortgage payments;
- (4) A statement that the notice of federal interest includes funds awarded in grant award(s) and any Head Start funds subsequently used to purchase, construct or to make major renovations to the real property;
- (5) A statement that the facility and real property will only be used for purposes consistent with the Act and applicable Head Start regulations;
- (6) A statement that the facility and real property will not be mortgaged or used as collateral, sold or otherwise transferred to another party, without the responsible HHS official's written permission;
- (7) A statement that the federal interest cannot be subordinated, diminished, nullified or released through encumbrance of the property, transfer of the property to another party or any other action the grantee takes without the responsible HHS official's written permission;
- (8) A statement that confirms that the agency's governing body received a copy of the notice of federal interest prior to filing and the date the governing body was provided with a copy; and,
- (9) The name, title, and signature of the person who drafted the notice.

(b) Facility leased by a grantee.

- (1) A notice of federal interest for a leased facility, excluding a modular unit, on land the grantee does not own, must be recorded in the official real property records for the jurisdiction where the facility is located and must include:
  - (i) The grantee's correct legal name and current mailing address;
  - (ii) A legal description of affected real property;
  - (iii) The grant award number, amount and date of initial funding award or initial use of base grant funds for major renovation;
  - (iv) Acknowledgement that the notice of federal interest includes any Head Start funds subsequently used to make major renovations on the affected real property;
  - (v) A statement the facility and real property will only be used for purposes consistent with the Act and applicable Head Start regulations; and,

(vi) A lease or occupancy agreement that includes the required information from paragraphs (b)(1)(i) through (v) of this section may be recorded in the official real property records for the jurisdiction where the facility is located to serve as a notice of federal interest.

(2) If a grantee cannot file the lease or occupancy agreement described in paragraph (b)(1)(vi) of this section in the official real property records for the jurisdiction where the facility is located, it may file an abstract. The abstract must include the names and addresses of parties to the lease or occupancy agreement, terms of the lease or occupancy agreement, and information described in paragraphs (a)(1) through (9) of this section.

(c) **Modular units.** A notice of federal interest on a modular unit the grantee purchased or renovated must be visible and clearly posted on the exterior of the modular and inside the modular and must include:

- (1) The grantee's correct legal name and current mailing address;
- (2) The grant award number, amount and date of initial funding award or initial use of base grant funds to purchase or renovate;
- (3) A statement that the notice of federal interest includes any Head Start funds subsequently used for major renovations to the modular unit;
- (4) A statement that the facility and real property will only be used for purposes consistent with the Act and applicable Head Start regulations;
- (5) A statement that the modular unit will not be mortgaged or used as collateral, sold or otherwise transferred to another party, without the responsible HHS official's written permission;
- (6) A statement that the federal interest cannot be subordinated, diminished, nullified or released through encumbrance of the property, transfer to another party, or any other action the grantee takes without the responsible HHS official's written permission;
- (7) A statement that the modular unit cannot be moved to another location without the responsible HHS official's written permission;
- (8) A statement that confirms that the agency's governing body has received a copy of the filed notice of federal interest and the date the governing body was provided with a copy; and,
- (9) The name, title, and signature of the person who completed the notice for the grantee agency.

### **§1303.48 Grantee limitations on federal interest.**

- (a) A grantee cannot mortgage, use as collateral for a credit line or for other loan obligations, or, sell or transfer to another party, a facility, real property, or a modular unit it has purchased, constructed or renovated with Head Start funds, without the responsible HHS official's written permission.
- (b) A grantee must have the responsible HHS official's written permission before it can use real

property, a facility, or a modular unit subject to federal interest for a purpose other than that for which the grantee's application was approved.

### **§1303.49 Protection of federal interest in mortgage agreements.**

(a) Any mortgage agreement or other security instrument that is secured by real property or a modular unit constructed or purchased in whole or in part with federal funds or subject to renovation with federal funds must:

- (1) Specify that the responsible HHS official can intervene in case the grantee defaults on, terminates or withdraws from the agreement;
- (2) Designate the responsible HHS official to receive a copy of any notice of default given to the grantee under the terms of the agreement and include the regional grants management officer's current address;
- (3) Include a clause that requires any action to foreclose the mortgage agreement or security agreement be suspended for 60 days after the responsible HHS official receives the default notice to allow the responsible HHS official reasonable time to respond;
- (4) Include a clause that preserves the notice of federal interest and the grantee's obligation for its federal share if the responsible HHS official fails to respond to any notice of default provided under this section;
- (5) Include a statement that requires the responsible HHS official to be paid the federal interest before foreclosure proceeds are paid to the lender, unless the official's rights under the notice of federal interest have been subordinated by a written agreement in conformance with §1303.51;
- (6) Include a clause that gives the responsible HHS official the right to cure any default under the agreement within the designated period to cure the default; and,
- (7) Include a clause that gives the responsible HHS official the right to assign or transfer the agreement to another interim or permanent grantee.

(b) A grantee must immediately notify the responsible HHS official of any default under an agreement described in paragraph (a) of this section.

### **§1303.50 Third party leases and occupancy arrangements.**

(a) After November 7, 2016, if a grantee receives federal funds to purchase, construct or renovate a facility on real property the grantee does not own or to purchase or renovate a modular unit on real property the grantee does not own, the grantee must have a lease or other occupancy agreement of at least 30 years for purchase or construction of a facility and at least 15 years for a major renovation or placement of a modular unit.

(b) The lease or occupancy agreement must:

- (1) Provide for the grantee’s right of continued use and occupancy of the leased or occupied premises during the entire term of the lease;
- (2) Designate the regional grants management officer to receive a copy of any notice of default given to the grantee under the terms of the agreement and include the regional grants management officer’s current address;
- (3) Specify that the responsible HHS official has the right to cure any default under the lease or occupancy agreement within the designated period to cure default; and,
- (4) Specify that the responsible HHS official has the right to transfer the lease to another interim or replacement grantee.

**§1303.51 Subordination of the federal interest.**

Only the responsible HHS official can subordinate federal interest to the rights of a lender or other third party. Subordination agreements must be in writing and the mortgage agreement or security agreement for which subordination is requested must comply with §1303.49. When the amount of federal funds already contributed to the facility exceeds the amount to be provided by the lender seeking subordination, the federal interest may only be subordinated if the grantee can show that funding is not available without subordination of the federal interest

**§1303.52 Insurance, bonding, and maintenance.**

(a) Purpose. If a grantee uses federal funds to purchase or continue purchase on a facility, excluding modular units, the grantee must obtain a title insurance policy for the purchase price that names the responsible HHS official as an additional loss payee.

(b) Insurance coverage.

- (1) If a grantee uses federal funds to purchase or continue purchase on a facility or modular unit the grantee must maintain physical damage or destruction insurance at the full replacement value of the facility, for as long as the grantee owns or occupies the facility.
- (2) If a facility is located in an area the National Flood Insurance Program defines as high risk, the grantee must maintain flood insurance for as long as the grantee owns or occupies the facility.
- (3) A grantee must submit to the responsible HHS official, within 10 days after coverage begins, proof of insurance coverage required under paragraphs (a) and (b) of this section.

(c) Maintenance. A grantee must keep all facilities purchased or constructed in whole or in part with Head Start funds in good repair in accordance with all applicable federal, state, and local laws, rules and regulations, including Head Start requirements, zoning requirements, building codes, health and safety regulations and child care licensing standards.

**§1303.53 Copies of documents.**

A grantee must submit to the responsible HHS official, within 10 days after filing or execution, copies of deeds, leases, loan instruments, mortgage agreements, notices of federal interest, and other legal documents related to the use of Head Start funds for purchase, construction, major renovation, or the discharge of any debt secured by the facility.

**§1303.54 Record retention.**

A grantee must retain records pertinent to the lease, purchase, construction or renovation of a facility funded in whole or in part with Head Start funds, for as long as the grantee owns or occupies the facility, plus three years.

**§1303.55 Procurement procedures.**

(a) A grantee must comply with all grants management regulations, including specific regulations applicable to transactions in excess of the current simplified acquisition threshold, cost principles, and its own procurement procedures, and must provide, to the maximum extent practical, open and full competition.

(b) A grantee must obtain the responsible HHS official's written approval before it uses Head Start funds, in whole or in part, to contract construction or renovation services. The grantee must ensure these contracts are paid on a lump sum fixed-price basis.

(c) A grantee must obtain prior written approval from the responsible HHS official for contract modifications that would change the scope or objective of a project or would materially alter the costs, by increasing the amount of grant funds needed to complete the project.

(d) A grantee must ensure all construction and renovation contracts paid, in whole or in part with Head Start funds contain a clause that gives the responsible HHS official or his or her designee access to the facility, at all reasonable times, during construction and inspection.

**§1303.56 Inspection of work.**

The grantee must submit to the responsible HHS official a final facility inspection report by a licensed engineer or architect within 30 calendar days after the project is completed. The inspection report must certify that the facility complies with local building codes, applicable child care licensing requirements, is structurally sound and safe for use as a Head Start facility, complies with the access requirements of the Americans with Disabilities Act, section 504 of the Rehabilitation Act, and the Flood Disaster Protection Act of 1973, and complies with National Historic Preservation Act of 1966.

## Subpart F — Transportation

### §1303.70 Purpose.

(a) Applicability. This rule applies to all agencies, including those that provide transportation services, with the exceptions and exclusions provided in this section, regardless of whether such transportation is provided directly on agency owned or leased vehicles or through arrangement with a private or public transportation provider.

(b) Providing transportation services.

(1) If a program does not provide transportation services, either for all or a portion of the children, it must provide reasonable assistance, such as information about public transit availability, to the families of such children to arrange transportation to and from its activities, and provide information about these transportation options in recruitment announcements.

(2) A program that provides transportation services must make reasonable efforts to coordinate transportation resources with other human services agencies in its community in order to control costs and to improve the quality and the availability of transportation services.

(3) A program that provides transportation services must ensure all accidents involving vehicles that transport children are reported in accordance with applicable state requirements.

(c) Waiver.

(1) A program that provides transportation services must comply with all provisions in this subpart. A Head Start program may request to waive a specific requirement in this part, in writing, to the responsible HHS official, as part of an agency's annual application for financial assistance or amendment and must submit any required documentation the responsible HHS official deems necessary to support the waiver. The responsible HHS official is not authorized to waive any requirements with regard to children enrolled in an Early Head Start program. A program may request a waiver when:

(i) Adherence to a requirement in this part would create a safety hazard in the circumstances faced by the agency; and,

(ii) For preschool children, compliance with requirements related to child restraint systems at §§1303.71(d) and 1303.72(a)(1) or bus monitors at §1303.72(a)(4) will result in a significant disruption to the program and the agency demonstrates that waiving such requirements is in the best interest of the children involved.

(2) The responsible HHS official is not authorized to waive any requirements of the Federal Motor Vehicle Safety Standards (FMVSS) made applicable to any class of vehicle under 49 CFR part 571.

## §1303.71 Vehicles.

(a) Required use of schools buses or allowable alternative vehicles. A program, with the exception of transportation services to children served under a home-based option, must ensure all vehicles used or purchased with grant funds to provide transportation services to enrolled children are school buses or allowable alternate vehicles that are equipped for use of height- and weight-appropriate child restraint systems, and that have reverse beepers.

(b) Emergency equipment. A program must ensure each vehicle used in providing such services is equipped with an emergency communication system clearly labeled and appropriate emergency safety equipment, including a seat belt cutter, charged fire extinguisher, and first aid kit.

(c) Auxiliary seating. A program must ensure any auxiliary seating, such as temporary or folding jump seats, used in vehicles of any type providing such services are built into the vehicle by the manufacturer as part of its standard design, are maintained in proper working order, and are inspected as part of the annual inspection required under paragraph (e)(2)(i) of this section.

(d) Child restraint systems. A program must ensure each vehicle used to transport children receiving such services is equipped for use of age-, height- and weight-appropriate child safety restraint systems as defined in part 1305 of this chapter.

(e) Vehicle maintenance.

(1) A program must ensure vehicles used to provide such services are in safe operating condition at all times.

(2) The program must:

(i) At a minimum, conduct an annual thorough safety inspection of each vehicle through an inspection program licensed or operated by the state;

(ii) Carry out systematic preventive maintenance on vehicles; and,

(iii) Ensure each driver implements daily pre-trip vehicle inspections.

(f) New vehicle inspection. A program must ensure bid announcements for school buses and allowable alternate vehicles to transport children in its program include correct specifications and a clear statement of the vehicle's intended use. The program must ensure vehicles are examined at delivery to ensure they are equipped in accordance with the bid specifications and that the manufacturer's certification of compliance with the applicable FMVSS is included with the vehicle.

## §1303.72 Vehicle operation.

(a) Safety. A program must ensure:

(1) Each child is seated in a child restraint system appropriate to the child's age, height, and weight;

(2) Baggage and other items transported in the passenger compartment are properly stored

and secured, and the aisles remain clear and the doors and emergency exits remain unobstructed at all times;

(3) Up-to-date child rosters and lists of the adults each child is authorized to be released to, including alternates in case of emergency, are maintained and no child is left behind, either at the classroom or on the vehicle at the end of the route; and,

(4) With the exception of transportation services to children served under a home-based option, there is at least one bus monitor on board at all times, with additional bus monitors provided as necessary.

(b) Driver qualifications. A program, with the exception of transportation services to children served under a home-based option, must ensure drivers, at a minimum:

(1) In states where such licenses are granted, have a valid Commercial Driver's License (CDL) for vehicles in the same class as the vehicle the driver will operating; and,

(2) Meet any physical, mental, and other requirements as necessary to perform job-related functions with any necessary reasonable accommodations.

(c) Driver application review. In addition to the applicant review process prescribed §1302.90(b) of this chapter, a program, with the exception of transportation services to children served under a home-based option, must ensure the applicant review process for drivers includes, at minimum:

(1) Disclosure by the applicant of all moving traffic violations, regardless of penalty;

(2) A check of the applicant's driving record through the appropriate state agency, including a check of the applicant's record through the National Driver Register, if available;

(3) A check that drivers qualify under the applicable driver training requirements in the state or tribal jurisdiction; and,

(4) After a conditional employment offer to the applicant and before the applicant begins work as a driver, a medical examination, performed by a licensed doctor of medicine or osteopathy, establishing that the individual possesses the physical ability to perform any job-related functions with any necessary accommodations.

(d) Driver training.

(1) A program must ensure any person employed as a driver receives training prior to transporting any enrolled child and receives refresher training each year.

(2) Training must include:

(i) Classroom instruction and behind-the-wheel instruction sufficient to enable the driver to operate the vehicle in a safe and efficient manner, to safely run a fixed route, to administer basic first aid in case of injury, and to handle emergency situations, including vehicle evacuation, operate any special equipment, such as wheelchair lifts, assistance devices or special occupant restraints, conduct routine maintenance and safety checks of the vehicle, and maintain accurate records as necessary; and,

(ii) Instruction on the topics listed in §1303.75 related to transportation services for children with disabilities.

(3) A program must ensure the annual evaluation of each driver of a vehicle used to provide such services includes an on-board observation of road performance.

(e) **Bus monitor training.** A program must train each bus monitor before the monitor begins work, on child boarding and exiting procedures, how to use child restraint systems, completing any required paperwork, how to respond to emergencies and emergency evacuation procedures, how to use special equipment, child pick-up and release procedures, how to conduct and pre- and post-trip vehicle checks. Bus monitors are also subject to staff safety training requirements in §1302.47(b)(4) of this chapter including Cardio Pulmonary Resuscitation (CPR) and first aid.

### **§1303.73 Trip routing.**

(a) A program must consider safety of the children it transports when it plans fixed routes.

(b) A program must also ensure:

(1) The time a child is in transit to and from the program must not exceed one hour unless there is no shorter route available or any alternative shorter route is either unsafe or impractical;

(2) Vehicles are not loaded beyond maximum passenger capacity at any time;

(3) Drivers do not back up or make U-turns, except when necessary for safety reasons or because of physical barriers;

(4) Stops are located to minimize traffic disruptions and to afford the driver a good field of view in front of and behind the vehicle;

(5) When possible, stops are located to eliminate the need for children to cross the street or highway to board or leave the vehicle;

(6) Either a bus monitor or another adult escorts children across the street to board or leave the vehicle if curbside pick-up or drop off is impossible; and,

(7) Drivers use alternate routes in the case of hazardous conditions that could affect the safety of the children who are being transported, such as ice or water build up, natural gas line breaks, or emergency road closing.

### **§1303.74 Safety procedures.**

(a) A program must ensure children who receive transportation services are taught safe riding practices, safety procedures for boarding and leaving the vehicle and for crossing the street to and from the vehicle at stops, recognition of the danger zones around the vehicle, and emergency evacuation procedures, including participating in an emergency evacuation drill conducted on the vehicle the child will be riding.

(b) A program that provides transportation services must ensure at least two bus evacuation drills in

addition to the one required under paragraph (a) of this section are conducted during the program year.

### **§1303.75 Children with disabilities.**

(a) A program must ensure there are school buses or allowable alternate vehicles adapted or designed for transportation of children with disabilities available as necessary to transport such children enrolled in the program. This requirement does not apply to the transportation of children receiving home-based services unless school buses or allowable alternate vehicles are used to transport the other children served under the home-based option by the grantee. Whenever possible, children with disabilities must be transported in the same vehicles used to transport other children enrolled in the Head Start or Early Head Start program.

(b) A program must ensure special transportation requirements in a child's IEP or IFSP are followed, including special pick-up and drop-off requirements, seating requirements, equipment needs, any assistance that may be required, and any necessary training for bus drivers and monitors.

## **Part 1304 — Federal Administrative Procedures**

Sec.

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AUTHORITY: 42 U.S.C. 9801 *et seq.*

**Subpart A — Monitoring, Suspension, Termination, Denial of Refunding, Reduction in Funding, and their Appeals****§ 1304.1 Purpose.**

(a) Section 641A(c) of the Act requires the Secretary to monitor whether a grantee meets program governance, program operations, and financial and administrative standards described in this regulation and to identify areas for improvements and areas of strength as part of the grantee's ongoing self-assessment process. This subpart focuses on the monitoring process. It discusses areas of noncompliance, deficiencies, and corrective action through quality improvement plans.

(b) Section 646(a) of the Act requires the Secretary to prescribe procedures for notice and appeal for certain adverse actions. This subpart establishes rules and procedures to suspend financial assistance to a grantee, deny a grantee's application for refunding, terminate, or reduce a grantee's assistance under the Act when the grantee improperly uses federal funds or fails to comply with applicable laws, regulations, policies, instructions, assurances, terms and conditions or, if the grantee loses its legal status or financial viability. This subpart does not apply to reductions to a grantee's financial assistance based on chronic under-enrollment procedures at section 641A(h) of the Act or to matters described in subpart B. This subpart does not apply to any administrative action based upon any violation, or alleged violation, of title VI of the Civil Rights Act of 1964. Except as otherwise provided for in this subpart, the appeals and processes in this subpart will be governed by the Departmental Appeals Board regulations at 45 CFR part 16.

**§ 1304.2 Monitoring.**

(a) Areas of noncompliance. If a responsible HHS official determines through monitoring, pursuant to section 641(A)(c)(1) and (2) of the Act, that a grantee fails to comply with any of the standards described in parts 1301, 1302, and 1303 of this chapter, the official will notify the grantee promptly in writing, identify the area of noncompliance, and specify when the grantee must correct the area of noncompliance.

(b) Deficiencies. If the Secretary determines that a grantee meets one of the criteria for a deficiency, as defined in section 637(2)(C) of the Act, the Secretary shall inform the grantee of the deficiency.

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The grantee must correct the deficiency pursuant to section 641A(e)(1)(B) of the Act, as the responsible HHS official determines.

(c) Quality improvement plans. If the responsible HHS official does not require the grantee to correct a deficiency immediately as prescribed under section 641A(e)(1)(B)(i) of the Act, the grantee must submit to the official, for approval, a quality improvement plan that adheres to section 641A(e)(2)(A) of the Act.

### **§1304.3 Suspension with notice.**

(a) Grounds to suspend financial assistance with notice. If a grantee breaches or threatens to breach any requirement stated in §§1304.3 through 1304.5, the responsible HHS official may suspend the grantee's financial assistance, in whole or in part, after it has given the grantee notice and an opportunity to show cause why assistance should not be suspended.

(b) Notice requirements.

(1) The responsible HHS official must notify the grantee in writing that ACF intends to suspend financial assistance, in whole or in part. The notice must:

(i) Specify grounds for the suspension;

(ii) Include the date suspension will become effective;

(iii) Inform the grantee that it has the opportunity to submit to the responsible HHS official, at least seven days before suspension becomes effective, any written material it would like the official to consider, and to inform the grantee that it may request, in writing, no later than seven days after the suspension notice was mailed, to have an informal meeting with the responsible HHS official;

(iv) Invite the grantee to voluntarily correct the deficiency; and,

(v) Include a copy of this subpart.

(2) The responsible HHS official must promptly transmit the suspension notice to the grantee. The notice becomes effective when the grantee receives the notice, when the grantee refuses delivery, or when the suspension notice is returned to sender unclaimed.

(3) The responsible HHS official must send a copy of the suspension notice to any delegate agency whose actions or whose failures to act substantially caused or contributed to the proposed suspension. The responsible HHS official will inform the delegate agency that it is entitled to submit written material to oppose the suspension and to participate in the informal meeting, if one is held. In addition, the responsible HHS official may give notice to the grantee's other delegate agencies.

(4) After the grantee receives the suspension notice, it has three days to send a copy of the notice to delegate agencies that would be financially affected by a suspension.

(c) Opportunity to show cause. The grantee may submit to the responsible HHS official any written material to show why financial assistance should not be suspended. The grantee may also request,

in writing, to have an informal meeting with the responsible HHS official. If the grantee requests an informal meeting, the responsible HHS official must schedule the meeting within seven days after the grantee receives the suspension notice.

(d) Extensions. If the responsible HHS official extends the time or the date by which a grantee has to make requests or to submit material, it must notify the grantee in writing.

(e) Decision.

(1) The responsible HHS official will consider any written material presented before or during the informal meeting, as well as any proof the grantee has adequately corrected what led to suspension, and will render a decision within five days after the informal meeting. If no informal meeting is held, the responsible HHS official will render a decision within five days after it receives written material from all concerned parties.

(2) If the responsible HHS official finds the grantee failed to show cause why ACF should not suspend financial assistance, the official may suspend financial assistance, in whole or in part, and under terms and conditions as he or she deems appropriate.

(3) A suspension must not exceed 30 days, unless the conditions under section 646(a)(5)(B) are applicable or the grantee requests the suspension continue for an additional period of time and the responsible HHS official agrees.

(4) The responsible HHS official may appoint an agency to serve as an interim grantee to operate the program until the grantee's suspension is lifted, or as otherwise provided under section 646(a)(5)(B) of the Act.

(f) Obligations incurred during suspension. New obligations the grantee incurs while under suspension are not allowed unless the responsible HHS official expressly authorizes them in the suspension notice or in an amendment to the suspension notice. Necessary and otherwise allowable costs which the grantee could not reasonably avoid during the suspension period will be allowed if they result from obligations the grantee properly incurred before suspension and not in anticipation of suspension or termination. The responsible HHS official may allow third-party in-kind contributions applicable to the suspension period to satisfy cost sharing or matching requirements.

(g) Modify or rescind suspension. The responsible HHS official may modify or rescind suspension at any time, if the grantee can satisfactorily show that it has adequately corrected what led to suspension and that it will not repeat such actions or inactions. Nothing in this section precludes the HHS official from imposing suspension again for additional 30 day periods if the cause of the suspension has not been corrected.

## **§1304.4 Emergency suspension without advance notice.**

(a) Grounds to suspend financial assistance without advance notice. The responsible HHS official may suspend financial assistance, in whole or in part, without prior notice and an opportunity to show cause if there is an emergency situation, such as a serious risk for substantial injury to property or loss of project funds, a federal, state, or local criminal statute violation, or harm to staff or participants' health and safety.

(b) Emergency suspension notification requirements.

(1) The emergency suspension notification must:

- (i) Specify the grounds for the suspension;
- (ii) Include terms and conditions of any full or partial suspension;
- (iii) Inform that grantee it cannot make or incur any new expenditures or obligations under suspended portion of the program; and,
- (iv) Advise that within five days after the emergency suspension becomes effective, the grantee may request, in writing, an informal meeting with the responsible HHS official to show why the basis for the suspension was not valid and should be rescinded and that the grantee has corrected any deficiencies.

(2) The responsible HHS official must promptly transmit the emergency suspension notification to the grantee that shows the date of receipt. The emergency suspension becomes effective upon delivery of the notification or upon the date the grantee refuses delivery, or upon return of the notification unclaimed.

(3) Within two workdays after the grantee receives the emergency suspension notification, the grantee must send a copy of the notice to delegate agencies affected by the suspension.

(4) The responsible HHS official must inform affected delegate agencies that they have the right to participate in the informal meeting.

(c) Opportunity to show cause. If the grantee requests an informal meeting, the responsible HHS official must schedule a meeting within five workdays after it receives the grantee's request. The suspension will continue until the grantee has been afforded such opportunity and until the responsible HHS official renders a decision. Notwithstanding provisions in this section, the responsible HHS official may proceed to deny refunding or to initiate termination proceedings at any time even though the grantee's financial assistance has been suspended in whole or in part.

(d) Decision.

(1) The responsible HHS official will consider any written material presented before or during the informal meeting, as well as any proof the grantee has adequately corrected what led to suspension, and render a decision within five work days after the informal meeting.

(2) If the responsible HHS official finds the grantee failed to show cause why suspension should be rescinded, the responsible HHS official may continue the suspension, in whole or in part, and under the terms and conditions specified in the emergency suspension notification.

(3) A suspension must not exceed 30 days, unless the conditions under section 646(a)(5)(B) are applicable or the grantee requests the suspension to continue for an additional period of time and the responsible HHS official agrees.

(4) The responsible HHS official may appoint an agency to serve as an interim grantee to operate the program until either the grantee's emergency suspension is lifted or a new grantee is selected.

(e) Obligations incurred during suspension. Any new obligations the grantee incurs during the suspension period will not be allowed unless the responsible HHS official expressly authorizes them in the suspension notice or in an amendment to the suspension notice. Necessary and otherwise allowable costs which the grantee could not reasonably avoid during the suspension period will be allowed if those costs result from obligations properly incurred before suspension and not in anticipation of suspension, denial of refunding or termination. The responsible HHS official may allow third-party in-kind contributions applicable to the suspension period to satisfy cost sharing or matching requirements.

(f) Modify or rescind suspension. The responsible HHS official may modify or rescind suspension at any time, if the grantee can satisfactorily show that it has adequately corrected what led to the suspension and that it will not repeat such actions or inactions. Nothing in this section precludes the HHS official from imposing suspension again for additional 30 day periods if the cause of the suspension has not been corrected.

### **§1304.5 Termination and denial of refunding.**

(a) Grounds to terminate financial assistance or deny a grantee's application for refunding.

(1) A responsible HHS official may terminate financial assistance in whole or in part to a grantee or deny a grantee's application for refunding.

(2) The responsible HHS official may terminate financial assistance in whole or in part, or deny refunding to a grantee for any one or for all of the following reasons:

(i) The grantee is no longer financially viable;

(ii) The grantee has lost the requisite legal status or permits;

(iii) The grantee has failed to timely correct one or more deficiencies as defined in the Act;

(iv) The grantee has failed to comply with eligibility requirements;

(v) The grantee has failed to comply with the Head Start grants administration or fiscal requirements set forth in 45 CFR part 1303;

(vi) The grantee has failed to comply with requirements in the Act;

(vii) The grantee is debarred from receiving federal grants or contracts; or

(viii) The grantee has failed to abide by any other terms and conditions of its award of financial assistance, or any other applicable laws, regulations, or other applicable federal or state requirements or policies.

(b) Notice requirements.

(1) The responsible HHS official will notify the grantee and such notice will:

(i) Include the legal basis for termination or adverse action as described in paragraph (a) of this section;

- (ii) Include factual findings on which the action is based or reference specific findings in another document that form the basis for termination or denial of refunding;
- (iii) Cite to any statutory provisions, regulations, or policy issuances on which ACF relies for its determination;
- (iv) Inform the grantee that it may appeal the denial or termination within 30 days to the Departmental Appeals Board, that the appeal will be governed by 45 CFR part 16, except as otherwise provided in the Head Start appeals regulations, that a copy of the appeal must be sent to the responsible HHS official, and that it has the right to request and receive a hearing, as mandated under section 646 of the Act;
- (v) Inform the grantee that only its board of directors, or an official acting on the board's behalf can appeal the decision;
- (vi) Name the delegate agency, if the actions of that delegate are the basis, in whole or in part, for the proposed action; and,
- (vii) Inform the grantee that the appeal must meet requirements in paragraph (c) of this section; and, that if the responsible HHS official fails to meet requirements in this paragraph, the pending action may be dismissed without prejudice or remanded to reissue it with corrections.

(2) The responsible HHS official must provide the grantee as much notice as possible, but must notify the grantee no later than 30 days after ACF receives the annual application for refunding, that it has the opportunity for a full and fair hearing on whether refunding should be denied.

(c) Grantee's appeal.

(1) The grantee must adhere to procedures and requirements for appeals in 45 CFR part 16, file the appeal with the Departmental Appeals Board, and serve a copy of the appeal on the responsible HHS official who issued the termination or denial of refunding notice. The grantees must also serve a copy of its appeal on any affected delegate.

(2) Unless funding has been suspended, funding will continue while a grantee appeals a termination decision, unless the responsible HHS official renders an adverse decision, or unless the current budget period is expired. If the responsible HHS official has not rendered a decision by the end of the current budget period, the official will award the grantee interim funding until a decision is made or the project period ends.

(d) Funding during suspension. If a grantee's funding is suspended, the grantee will not receive funding during the termination proceedings, or at any other time, unless the action is rescinded or the grantee's appeal is successful.

(e) Interim and replacement grantees. The responsible HHS official may appoint an interim or replacement grantee as soon as a termination action is affirmed by the Departmental Appeals Board.

(f) Opportunity to show cause.

- (1) If the Departmental Appeals Board sets a hearing for a proposed termination or denial of refunding action, the grantee has five workdays to send a copy of the notice it receives from the Departmental Appeals Board, to all delegate agencies that would be financially affected by termination and to each delegate agency identified in the notice.
- (2) The grantee must send to the Departmental Appeals Board and to the responsible HHS official a list of the delegate agencies it notified and the dates when it notified them.
- (3) If the responsible HHS official initiated proceedings because of a delegate agency's activities, the official must inform the delegate agency that it may participate in the hearing. If the delegate agency chooses to participate in the hearing, it must notify the responsible HHS official in writing within 30 days of the grantee's appeal. If any other delegate agency, person, agency or organization wishes to participate in the hearing, it may request permission to do so from the Departmental Appeals Board.
- (4) If the grantee fails to appear at the hearing, without good cause, the grantee will be deemed to have waived its right to a hearing and consented to have the Departmental Appeals Board make a decision based on the parties' written information and argument.
- (5) A grantee may waive the hearing and submit written information and argument for the record, within a reasonable period of time to be fixed by the Departmental Appeals Board.
- (6) The responsible HHS official may attempt, either personally or through a representative, to resolve the issues in dispute by informal means prior to the hearing.

(g) Decision. The Departmental Appeals Board's decision and any measure the responsible HHS official takes after the decision is fully binding upon the grantee and its delegate agencies, whether or not they actually participated in the hearing.

### **§1304.6 Appeal for prospective delegate agencies.**

- (a) Appeal. If a grantee denies, or fails to act on, a prospective delegate agency's funding application, the prospective delegate may appeal the grantee's decision or inaction.
- (b) Process for prospective delegates. To appeal, a prospective delegate must:
  - (1) Submits the appeal, including a copy of the funding application, to the responsible HHS official within 30 days after it receives the grantee's decision; or within 30 days after the grantee has had 120 days to review but has not notified the applicant of a decision; and,
  - (2) Provide the grantee with a copy of the appeal at the same time the appeal is filed with the responsible HHS official.
- (c) Process for grantees. When an appeal is filed with the responsible HHS official, the grantee must respond to the appeal and submit a copy of its response to the responsible HHS official and to the prospective delegate agency within 30 work days.
- (d) Decision.
  - (1) The responsible HHS official will sustain the grantee's decision, if the official determines

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the grantee did not act arbitrarily, capriciously, or otherwise contrary to law, regulation, or other applicable requirements.

(2) The responsible HHS official will render a written decision to each party within a reasonable timeframe. The official's decision is final and not subject to further appeal.

(3) If the responsible HHS official finds the grantee did act arbitrarily, capriciously, or otherwise contrary to law, regulation, or other applicable requirements, the grantee will be directed to reevaluate their applications.

### **§1304.7 Legal fees.**

(a) An agency is not authorized to charge to its grant legal fees or other costs incurred to appeal terminations, reductions of funding, or denials of applications of refunding decisions.

(b) If a program prevails in a termination, reduction, or denial of refunding decision, the responsible HHS official may reimburse the agency for reasonable and customary legal fees, incurred during the appeal, if:

- (1) The Departmental Appeals Board overturns the responsible HHS official's decision;
- (2) The agency can prove it incurred fees during the appeal; and,
- (3) The agency can prove the fees incurred are reasonable and customary.

## **Subpart B — Designation Renewal**

### **§1304.10 Purpose and scope.**

The purpose of this subpart is to set forth policies and procedures for the designation renewal of Head Start and Early Head Start programs. It is intended that these programs be administered effectively and responsibly; that applicants to administer programs receive fair and equitable consideration; and that the legal rights of current Head Start and Early Head Start grantees be fully protected. The Designation Renewal System is established in this part to determine whether Head Start and Early Head Start agencies deliver high-quality services to meet the educational, health, nutritional, and social needs of the children and families they serve; meet the program and financial requirements and standards described in section 641A(a)(1) of the Head Start Act; and qualify to be designated for funding for five years without competing for such funding as required under section 641(c) of the Head Start Act with respect to Head Start agencies and pursuant to section 645A(b)(12) and (d) with respect to Early Head Start agencies. A competition to select a new Head Start or Early Head Start agency to replace a Head Start or Early Head Start agency that has been terminated voluntarily or involuntarily is not part of the Designation Renewal System established in this Part, and is subject instead to the requirements of §1304.20.

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**§1304.11 Basis for determining whether a Head Start agency will be subject to an open competition.**

A Head Start or Early Head Start agency shall be required to compete for its next five years of funding whenever the responsible HHS official determines that one or more of the following seven conditions existed during the relevant time period covered by the responsible HHS official's review under §1304.15:

(a) An agency has been determined by the responsible HHS official to have one or more deficiencies on a single review conducted under section 641A(c)(1)(A), (C), or (D) of the Act in the relevant time period covered by the responsible HHS official's review under §1304.15.

(b) An agency has been determined by the responsible HHS official based on a review conducted under section 641A(c)(1)(A), (C), or (D) of the Act during the relevant time period covered by the responsible HHS official's review under §1304.15 not to have:

(1) After December 9, 2011, established program goals for improving the school readiness of children participating in its program in accordance with the requirements of section 641A(g)(2) of the Act and demonstrated that such goals:

(i) Appropriately reflect the ages of children, birth to five, participating in the program;

(ii) Align with the Birth to Five Head Start Child Outcomes Framework, state early learning guidelines, and the requirements and expectations of the schools, to the extent that they apply to the ages of children, birth to five, participating in the program and at a minimum address the domains of language and literacy development, cognition and general knowledge, approaches toward learning, physical well-being and motor development, and social and emotional development;

(iii) Were established in consultation with the parents of children participating in the program.

(2) After December 9, 2011, taken steps to achieve the school readiness goals described under paragraph (b)(1) of this section demonstrated by:

(i) Aggregating and analyzing aggregate child-level assessment data at least three times per year (except for programs operating less than 90 days, which will be required to do so at least twice within their operating program period) and using that data in combination with other program data to determine grantees' progress toward meeting its goals, to inform parents and the community of results, and to direct continuous improvement related to curriculum, instruction, professional development, program design and other program decisions; and,

(ii) Analyzing individual ongoing, child-level assessment data for all children birth to age five participating in the program and using that data in combination with input from parents and families to determine each child's status and progress with regard to, at a minimum, language and literacy development, cognition and general knowledge, approaches toward learning, physical well-being and motor development, and social and emotional

development and to individualize the experiences, instructional strategies, and services to best support each child.

(c) An agency has been determined during the relevant time period covered by the responsible HHS official's review under §1304.15:

(1) After December 9, 2011, to have an average score across all classrooms observed below the following minimum thresholds on any of the three CLASS: Pre-K domains from the most recent CLASS: Pre-K observation:

- (i) For the Emotional Support domain the minimum threshold is 4;
- (ii) For the Classroom Organization domain, the minimum threshold is 3;
- (iii) For the Instructional Support domain, the minimum threshold is 2;

(2) After December 9, 2011, to have an average score across all classrooms observed that is in the lowest 10 percent on any of the three CLASS: Pre-K domains from the most recent CLASS: Pre-K observation among those currently being reviewed unless the average score across all classrooms observed for that CLASS: Pre-K domain is equal to or above the standard of excellence that demonstrates that the classroom interactions are above an exceptional level of quality. For all three domains, the “standard of excellence” is a 6.

(d) An agency has had a revocation of its license to operate a Head Start or Early Head Start center or program by a state or local licensing agency during the relevant time period covered by the responsible HHS official's review under §1304.15, and the revocation has not been overturned or withdrawn before a competition for funding for the next five-year period is announced. A pending challenge to the license revocation or restoration of the license after correction of the violation shall not affect application of this requirement after the competition for funding for the next five-year period has been announced.

(e) An agency has been suspended from the Head Start or Early Head Start program by ACF during the relevant time period covered by the responsible HHS official's review under §1304.16 and the suspension has not been overturned or withdrawn. If there is a pending appeal and the agency did not have an opportunity to show cause as to why the suspension should not have been imposed or why the suspension should have been lifted if it had already been imposed under this part, the agency will not be required to compete based on this condition. If an agency has received an opportunity to show cause, the condition will be implemented regardless of appeal status.

(f) An agency has been debarred from receiving federal or state funds from any federal or state department or agency or has been disqualified from the Child and Adult Care Food Program (CACFP) any time during the relevant time period covered by the responsible HHS official's review under §1304.15 but has not yet been terminated or denied refunding by ACF. (A debarred agency will only be eligible to compete for Head Start funding if it receives a waiver described in 2 CFR 180.135.)

(g) An agency has been determined within the twelve months preceding the responsible HHS official's review under §1304.15 to be at risk of failing to continue functioning as a going concern. The final determination is made by the responsible HHS official based on a review of the findings and opinions of an audit conducted in accordance with section 647 of the Act; an audit, review or

investigation by a state agency; a review by the National External Audit Review (NEAR) Center; or an audit, investigation or inspection by the Department of Health and Human Services Office of Inspector General.

### **§1304.12 Grantee reporting requirements concerning certain conditions.**

(a) Head Start agencies must report in writing to the responsible HHS official within 30 working days of December 9, 2011, if the agency has had a revocation of a license to operate a center by a state or local licensing entity during the period between June 12, 2009, and December 9, 2011.

(b) Head Start agencies must report in writing to the responsible HHS official within 10 working days of occurrence any of the following events following December 9, 2011:

- (1) The agency has had a revocation of a license to operate a center by a state or local licensing entity.
- (2) The agency has filed for bankruptcy or agreed to a reorganization plan as part of a bankruptcy settlement.
- (3) The agency has been debarred from receiving federal or state funds from any federal or state department or agency or has been disqualified from the Child and Adult Care Food Program (CACFP).
- (4) The agency has received an audit, audit review, investigation or inspection report from the agency's auditor, a state agency, or the cognizant federal audit agency containing a determination that the agency is at risk for ceasing to be a going concern.

### **§1304.13 Requirements to be considered for designation for a five-year period when the existing grantee in a community is not determined to be delivering a high-quality and comprehensive Head Start program and is not automatically renewed.**

In order to compete for the opportunity to be awarded a five-year grant, an agency must submit an application to the responsible HHS official that demonstrates that it is the most qualified entity to deliver a high-quality and comprehensive Head Start or Early Head Start program. The application must address the criteria for selection listed at section 641(d)(2) of the Act for Head Start. Any agency that has had its Head Start or Early Head Start grant terminated for cause in the preceding five years is excluded from competing in such competition for the next five years. A Head Start or Early Head Start agency that has had a denial of refunding, as defined in 45 CFR part 1305, in the preceding five years is also excluded from competing.

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## **§1304.14 Tribal government consultation under the Designation Renewal System for when an Indian Head Start grant is being considered for competition.**

(a) In the case of an Indian Head Start or Early Head Start agency determined not to be delivering a high-quality and comprehensive Head Start or Early Head Start program, the responsible HHS official will engage in government-to-government consultation with the appropriate tribal government or governments for the purpose of establishing a plan to improve the quality of the Head Start program or Early Head Start program operated by the Indian Head Start or Indian Early Head Start agency.

(1) The plan will be established and implemented within six months after the responsible HHS official's determination.

(2) Not more than six months after the implementation of that plan, the responsible HHS official will reevaluate the performance of the Indian Head Start or Early Head Start agency.

(3) If the Indian Head Start or Early Head Start agency is still not delivering a high-quality and comprehensive Head Start or Early Head Start program, the responsible HHS official will conduct an open competition to select a grantee to provide services for the community currently being served by the Indian Head Start or Early Head Start agency.

(b) A non-Indian Head Start or Early Head Start agency will not be eligible to receive a grant to carry out an Indian Head Start program, unless there is no Indian Head Start or Early Head Start agency available for designation to carry out an Indian Head Start or Indian Early Head Start program.

(c) A non-Indian Head Start or Early Head Start agency may receive a grant to carry out an Indian Head Start program only until such time as an Indian Head Start or Indian Early Head Start agency in such community becomes available and is designated pursuant to this part.

## **§1304.15 Designation request, review and notification process.**

(a) Grantees must apply to be considered for Designation Renewal.

(1) For the transition period, each Head Start or Early Head Start agency wishing to be considered to have their designation as a Head Start or Early Head Start agency renewed for a five year period without competition shall request that status from ACF within six months of December 9, 2011.

(2) After the transition period, each Head Start or Early Head Start agency wishing to be considered to have their designation as a Head Start or Early Head Start agency renewed for another five year period without competition shall request that status from ACF at least 12 months before the end of their five year grant period or by such time as required by the Secretary.

(b) ACF will review the relevant data to determine if one or more of the conditions under §1304.11 were met by the Head Start and Early Head Start agency's program:

(1) During the first year of the transition period, ACF shall review the data on each Head Start and Early Head Start agency to determine if any of the conditions under §1304.11(a) or (d) through (g) were met by the agency's program since June 12, 2009.

(2) During the remainder of the transition period, ACF shall review the data on each Head Start and Early Head Start agency still under grants with indefinite project periods and for whom ACF has relevant data on all of the conditions in §1304.11(a) through (g) to determine if any of the conditions under §1304.11 (a) or (d) through (g) were met by the agency's program since June 12, 2009, or if the conditions under §1304.11(b) or (c) existed in the agency's program since December 9, 2011.

(3) Following the transition period, ACF shall review the data on each Head Start and Early Head Start agency in the fourth year of the grant to determine if any of the conditions under §1304.11 existed in the agency's program during the period of that grant.

(c) ACF will give notice to grantees on Designation Renewal System status, except as provided in §1304.14:

(1) During the first year of the transition period, ACF shall give written notice to all grantees meeting any of the conditions under §1304.11(a) or (d) through (g) since June 12, 2009, by certified mail return receipt requested or other system that establishes the date of receipt of the notice by the addressee, stating that the Head Start or Early Head Start agency will be required to compete for funding for an additional five-year period, identifying the conditions ACF found, and summarizing the basis for the finding. All grantees that do not meet any of the conditions under §1304.11(a) or (d) through (g) will remain under indefinite project periods until the time period described under paragraph (b)(2) of this section.

(2) During the remainder of the transition period, ACF shall give written notice to all grantees still under grants with indefinite project periods and on the conditions in §1304.11(a) through (g) by certified mail return receipt requested or other system that establishes the date of receipt of the notice by the addressee stating either:

(i) The Head Start or Early Head Start agency will be required to compete for funding for an additional five-year period because ACF finds that one or more conditions under §1304.11(a) through (g) has been met during the relevant time period described in paragraph (b) of this section, identifying the conditions ACF found, and summarizing the basis for the finding; or

(ii) That such agency has been determined on a preliminary basis to be eligible for renewed funding for five years without competition because ACF finds that none of the conditions under §1304.11 have been met during the relevant time period described in paragraph (b) of this section. If prior to the award of that grant, ACF determines that the grantee has met one of the conditions under §1304.11 during the relevant time period described in paragraph (b) of this section, this determination will change and the grantee will receive notice under paragraph (c)(2)(i) of this section that it will be required to compete for funding for an additional five-year period.

(3) Following the transition period, ACF shall give written notice to all grantees at least 12 months before the expiration date of a Head Start or Early Head Start agency's then current

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grant by certified mail return receipt requested or other system that establishes the date of receipt of the notice by the addressee, stating:

- (i) The Head Start or Early Head Start agency will be required to compete for funding for an additional five-year period because ACF finds that one or more conditions under §1304.11 were met by the agency's program during the relevant time period described in paragraph (b) of this section, identifying the conditions ACF found, and summarizing the basis for the finding; or,
- (ii) That such agency has been determined on a preliminary basis to be eligible for renewed funding for five years without competition because ACF finds that none of the conditions under §1304.11 have been met during the relevant time period described in paragraph (b) of this section. If prior to the award of that grant, ACF determines that the grantee has met one of the conditions under §1304.11 during the relevant time period described in paragraph (b) of this section, this determination will change and the grantee will receive notice under paragraph (c)(3)(i) of this section that it will be required to compete for funding for an additional five-year period.

### **§1304.16 Use of CLASS: Pre-K instrument in the Designation Renewal System.**

Except when all children are served in a single classroom, ACF will conduct observations of multiple classes operated by the grantee based on a random sample of all classes and rate the conduct of the classes observed using the CLASS: Pre-K instrument. When the grantee serves children in its program in a single class, that class will be observed and rated using the CLASS: Pre-K instrument. The domain scores for that class will be the domain scores for the grantee for that observation. After the observations are completed, ACF will report to the grantee the scores of the classes observed during the CLASS: Pre-K observations in each of the domains covered by the CLASS: Pre-K instrument. ACF will average CLASS: Pre-K instrument scores in each domain for the classes operated by the agency that ACF observed to determine the agency's score in each domain.

## **Subpart C — Selection of Grantees through Competition**

### **§1304.20 Selection among applicants.**

- (a) In selecting an agency to be designated to provide Head Start, Early Head Start, Migrant or Seasonal Head Start or tribal Head Start or Early Head Start services, the responsible HHS official will consider the applicable criteria at Section 641(d) of the Head Start Act and any other criteria outlined in the funding opportunity announcement.
- (b) In competitions to replace or potentially replace a grantee the responsible HHS official will also consider the extent to which the applicant supports continuity for participating children, the community and the continued employment of effective, well qualified personnel.
- (c) In competitions to replace or potentially replace a current grantee, the responsible HHS official will give priority to applicants that have demonstrated capacity in providing effective, comprehen-

sive, and well-coordinated early childhood education and development services and programs to children and their families.

## **Subpart D — Replacement of American Indian and Alaska Native Grantees**

### **§1304.30 Procedure for identification of alternative agency.**

(a) An Indian tribe whose Head Start grant has been terminated, relinquished, designated for competition or which has been denied refunding as a Head Start agency, may identify an alternate agency and request the responsible HHS official to designate such agency as an alternative agency to provide Head Start services to the tribe if:

(1) The tribe was the only agency that was receiving federal financial assistance to provide Head Start services to members of the tribe; and,

(2) The tribe would be otherwise precluded from providing such services to its members because of the termination or denial of refunding.

(b)

(1) The responsible HHS official, when notifying a tribal grantee of the intent to terminate financial assistance or deny its application for refunding, or its designation for competition must notify the grantee that it may identify an agency and request that the agency serve as the alternative agency in the event that the grant is terminated or refunding denied, or the grant is not renewed without competition.

(2) The tribe must identify the alternate agency to the responsible HHS official in writing.

(3) The responsible HHS official will notify the tribe, in writing, whether the alternative agency proposed by the tribe is found to be eligible for Head Start funding and capable of operating a Head Start program. If the alternative agency identified by the tribe is not an eligible agency capable of operating a Head Start program, the tribe will have 15 days from the date of the sending of the notification to that effect from the responsible HHS official to identify another agency and request that the agency be designated. The responsible HHS official will notify the tribe in writing whether the second proposed alternate agency is found to be an eligible agency capable of operating the Head Start program.

(4) If the tribe does not identify an eligible, suitable alternative agency, a grantee will be designated under these regulations.

(c) If the tribe appeals a termination of financial assistance or a denial of refunding, it will, consistent with the terms of §1304.5, continue to be funded pending resolution of the appeal. However, the responsible HHS official and the grantee will proceed with the steps outlined in this regulation during the appeal process.

(d) If the tribe does not identify an agency and request that the agency be appointed as the alter-

native agency, the responsible HHS official will seek a permanent replacement grantee under these regulations.

### **§1304.31 Requirements of alternative agency.**

The agency identified by the Indian tribe must establish that it meets all requirements established by the Head Start Act and these requirements for designation as a Head Start grantee and that it is capable of conducting a Head Start program. The responsible HHS official, in deciding whether to designate the proposed agency, will analyze the capacity and experience of the agency according to the criteria found in section 641(d) of the Head Start Act and §1304.20.

### **§1304.32 Alternative agency—prohibition.**

(a) No agency will be designated as the alternative agency pursuant to this subpart if the agency includes an employee who:

(1) Served on the administrative or program staff of the Indian tribal grantee described under section 646(e)(1)(A) of the Act; and

(2) Was responsible for a deficiency that:

(i) Relates to the performance standards or financial management standards described in section 641A(a)(1) of the Act; and,

(ii) Was the basis for the termination of assistance under section 646(e)(1)(A) of the Act or denial of refunding described in §1304.4.

(b) The responsible HHS official shall determine whether an employee was responsible for a deficiency within the meaning and context of this section.

## **Subpart E — Head Start Fellows Program**

### **§1304.40 Purpose.**

As provided in section 648A(d) of the Act, the Head Start Fellows Program is designed to enhance the ability of Head Start Fellows to make significant contributions to Head Start and to other child development and family services programs.

### **§1304.41 Head Start Fellows Program.**

(a) Selection. An applicant must be working on the date of application in a local Head Start program or otherwise working in the field of child development and family services. The qualifications of the applicants for Head Start Fellowship positions will be competitively reviewed.

(b) Placement. Head Start Fellows may be placed in the Head Start national and regional offices; local Head Start agencies and programs; institutions of higher education; public or private entities and organizations concerned with services to children and families; and other appropriate settings.

(c) **Restrictions.** A Head Start Fellow who is not an employee of a local Head Start agency or program may only be placed in the national or regional offices within the Department of Health and Human Services that administer Head Start or local Head Start agencies. Head Start Fellows shall not be placed in any agency whose primary purpose, or one of whose major purposes is to influence federal, state or local legislation.

(d) **Duration.** Head Start Fellowships will be for terms of one year, and may be renewed for a term of one additional year.

(e) **Status.** For the purposes of compensation for injuries under chapter 81 of title 5, United States Code, Head Start Fellows shall be considered to be employees, or otherwise in the service or employment, of the federal government. Head Start Fellows assigned to the national or regional offices within the Department of Health and Human Services shall be considered employees in the Executive Branch of the federal government for the purposes of chapter 11 of title 18, United States Code, and for the purposes of any administrative standards of conduct applicable to the employees of the agency to which they are assigned.

## Part 1305 — Definitions

Sec.

1305.1 Purpose.

1305.2 Terms.

AUTHORITY: 42 U.S.C. 9801 *et seq.*

### §1305.1 Purpose.

The purpose of this part is to define terms for the purposes of this subchapter.

### §1305.2 Terms.

For the purposes of this subchapter, the following definitions apply:

*ACF* means the Administration for Children and Families in the Department of Health and Human Services.

*Act* means the Head Start Act, Sec. 635 *et seq.*, Pub. L. 97-35, 95 Stat. 499-511 (codified as amended at 42 U.S.C. Section 9801, *et seq.*).

*Agency* means the body that receives the Head Start grant.

*Aggregate child-level assessment data* means the data collected by an agency on the status and progress of the children it serves that have been combined to provide summary information about groups of children enrolled in specific classes, centers, home-based or other options, groups or settings, or other groups of children such as dual language learners, or to provide summary information by specific domains of development.

*Allowable alternate vehicle* means a vehicle designed for carrying eleven or more people, including the

driver, that meets all the Federal Motor Vehicle Safety Standards applicable to school buses, except 49 CFR 571.108 and 571.131.

*Budget period* means the interval of time, into which a multi-year period of assistance (project period) is divided for budgetary and funding purposes.

*Case plan* is defined as presented in 42 U.S.C. 675(1) which, in summary, is a written document that must include a number of specified items including, but is not limited to, a plan for safe and proper care of the child in foster care placement, health records, and a plan for ensuring the educational stability of the child in foster care.

*Child-level assessment data* means the data collected by an agency on an individual child from one or more valid and reliable assessments of a child's status and progress, including but not limited to direct assessment, structured observations, checklists, staff or parent report measures, and portfolio records or work samples.

*Child records* means records that:

- (1) Are directly related to the child;
- (2) Are maintained by the program, or by a party acting for the program; and
- (3) Include information recorded in any way, such as print, electronic, or digital means, including media, video, image, or audio format.

*Child restraint system* means any device designed to restrain, seat, or position children that meets the current requirements of Federal Motor Vehicle Safety Standard No. 213, Child Restraint Systems, 49 CFR 571.213, for children in the weight category established under the regulation, or any device designed to restrain, seat, or position children, other than a Type I seat belt as defined at 49 CFR 571.209, for children not in the weight category currently established by 49 CFR 571.213.

*Child with a disability* is defined in the same manner as presented in the Head Start Act, 42 U.S.C. 9801.

*CLASS: Pre-K* means The Classroom Assessment Scoring System (CLASS). The CLASS is an observational instrument that assesses classroom quality in preschool through third grade classrooms. This tool meets the requirements described in 641(c)(1)(D) and 641A(c)(2)(F) of the Head Start Act (42 U.S.C. 9836(c)(1)(D) and 9836a(c)(2)(F)). The CLASS assesses three domains of classroom experience: Emotional Support, Classroom Organization, and Instructional Support.

- (1) Emotional Support measures children's social and emotional functioning in the classroom, and includes four dimensions: Positive Climate, Negative Climate, Teacher Sensitivity and Regard for Student Perspectives. Positive Climate addresses the emotional connection, respect, and enjoyment demonstrated between teachers and children and among children. Negative Climate addresses the level of expressed negativity such as anger, hostility, or aggression exhibited by teachers and/or children in the classroom. Teacher Sensitivity addresses teachers' awareness of and responsiveness to children's academic and emotional concerns. Regard for Student Perspectives addresses the degree to which teachers' interactions with children and classroom activities place an emphasis on children's interests, motivations, and points of view.

(2) Classroom Organization measures a broad array of classroom processes related to the organization and management of children's behavior, time, and attention in the classroom. It includes three dimensions: Behavior Management, Productivity, and Instructional Learning Formats. Behavior Management addresses how effectively teachers monitor, prevent, and redirect behavior. Productivity addresses how well the classroom runs with respect to routines and the degree to which teachers organize activities and directions so that maximum time can be spent on learning activities. Instructional Learning Formats addresses how teachers facilitate activities and provide interesting materials so that children are engaged and learning opportunities are maximized.

(3) Instructional Support measures the ways in which teachers implement curriculum to effectively support cognitive and language development. It includes three dimensions: Concept Development, Quality of Feedback, and Language Modeling. Concept Development addresses how teachers use instructional discussions and activities to promote children's higher order thinking skills in contrast to a focus on rote instruction. Quality of Feedback addresses how teachers extend children's learning through their responses to children's ideas, comments, and work. Language Modeling addresses the extent to which teachers facilitate and encourage children's language.

(4) Assessments with the CLASS involve observation-based measurement of each dimension on a seven point scale. A score ranging from 1 (minimally characteristic) to 7 (highly characteristic) is given for each dimension and represents the extent to which that dimension is characteristic of that classroom. Relevant dimension scores are used to calculate each domain score.

*Commercial Driver's License (CDL)* means a license issued by a state or other jurisdiction, in accordance with the standards contained in 49 CFR part 383, to an individual which authorizes the individual to operate a class of commercial motor vehicles.

*Construction* means new buildings, and excludes renovations, alterations, additions, or work of any kind to existing buildings.

*Continuity of care* means Head Start or Early Head Start services provided to children in a manner that promotes primary caregiving and minimizes the number of transitions in teachers and teacher assistants that children experience over the course of the day, week, program year, and to the extent possible, during the course of their participation from birth to age three in Early Head Start and in Head Start.

*Deficiency* is defined in the same manner as presented in the Head Start Act, 42 U.S.C. 9801.

*Delegate agency* is defined in the same manner as presented in the Head Start Act, 42 U.S.C. 9801.

*Development and administrative costs* mean costs incurred in accordance with an approved Head Start budget which do not directly relate to the provision of program component services, including services to children with disabilities, as set forth and described in the Head Start program performance standards (45 CFR part 1304).

*Disclosure* means to permit access to or the release, transfer, or other communication of PII con-

tained in child records by any means, including oral, written, or electronic means, to any party except the party identified as the party that provided or created the record.

*Double session variation* means a center-based option that employs a single teacher to work with one group of children in the morning and a different group of children in the afternoon.

*Dual benefit costs* mean costs incurred in accordance with an approved Head Start budget which directly relate to both development and administrative functions and to the program component services, including services to children with disabilities, as set forth and described in the Head Start program performance standards (45 CFR part 1304).

*Dual language learner* means a child who is acquiring two or more languages at the same time, or a child who is learning a second language while continuing to develop their first language. The term "dual language learner" may encompass or overlap substantially with other terms frequently used, such as bilingual, English language learner (ELL), Limited English Proficient (LEP), English learner, and children who speak a Language Other Than English (LOTE).

*Early Head Start agency* means a public or private non-profit or for-profit entity designated by ACF to operate an Early Head Start program to serve pregnant women and children from birth to age three, pursuant to Section 645A(e) of the Head Start Act.

*Enrolled (or any variation of)* means a child has been accepted and attended at least one class for center-based or family child care option or at least one home visit for the home-based option.

*Enrollment year* means the period of time, not to exceed twelve months, during which a Head Start program provides center or home-based services to a group of children and their families.

*Facility* means a structure, such as a building or modular unit, appropriate for use in carrying out a Head Start program and used primarily to provide Head Start services, including services to children and their families, or for administrative purposes or other activities necessary to carry out a Head Start program.

*Family* means all persons living in the same household who are supported by the child's parent(s)' or guardian(s)' income; and are related to the child's parent(s) or guardian(s) by blood, marriage, or adoption; or are the child's authorized caregiver or legally responsible party.

*Federal interest* is a property right which secures the right of the federal awarding agency to recover the current fair market value of its percentage of participation in the cost of the facility in the event the facility is no longer used for Head Start purposes by the grantee or upon the disposition of the property. When a grantee uses Head Start funds to purchase, construct or renovate a facility, or make mortgage payments, it creates a federal interest. The federal interest includes any portion of the cost of purchase, construction, or renovation contributed by or for the entity, or a related donor organization, to satisfy a matching requirement.

*Federal Motor Vehicle Safety Standards (FMVSS)* means the National Highway and Traffic Safety Administration's standards for motor vehicles and motor vehicle equipment (49 CFR part 571) established under section 30111 of Title 49, United States Code.

*Financial viability* means that an organization is able to meet its financial obligations, balance funding and expenses and maintain sufficient funding to achieve organizational goals and objectives.

*Fixed route* means the established routes to be traveled on a regular basis by vehicles that transport children to and from Head Start or Early Head Start program activities, and which include specifically designated stops where children board or exit the vehicle.

*Foster care* means 24-hour substitute care for children placed away from their parents or guardians and for whom the state agency has placement and care responsibility. This includes, but is not limited to, placements in foster family homes, foster homes of relatives, group homes, emergency shelters, residential facilities, child-care institutions, and pre-adoptive homes. A child is in foster care in accordance with this definition regardless of whether the foster care facility is licensed and payments are made by the state or local agency for the care of the child, whether adoption subsidy payments are being made prior to the finalization of an adoption, or whether there is federal matching of any payments that are made.

*Full-working-day* means not less than 10 hours of Head Start or Early Head Start services per day.

*Funded enrollment* means the number of participants which the Head Start grantee is to serve, as indicated on the grant award.

*Going concern* means an organization that operates without the threat of liquidation for the foreseeable future, a period of at least 12 months.

*Grantee* means the local public or private non-profit agency or for-profit agency which has been designated as a Head Start agency under 42 U.S.C. 9836 and which has been granted financial assistance by the responsible HHS official to operate a Head Start program.

*Head Start agency* means a local public or private non-profit or for-profit entity designated by ACF to operate a Head Start program to serve children age three to compulsory school age, pursuant to section 641(b) and (d) of the Head Start Act.

*Head Start Early Learning Outcomes Framework: Ages Birth to Five* means the Head Start Early Learning Outcomes Framework: Ages Birth to Five, which describes the skills, behaviors, and knowledge that programs must foster in all children. It includes five central domains: Approaches to Learning; Social and Emotional Development; Language and Literacy; Cognition; and Perceptual, Motor, and Physical Development. These central domains are broken into five domains for infants and toddlers and seven domains for preschoolers. Infant and Toddler domains are Approaches to Learning; Social and Emotional Development; Language and Communication; Cognition; and Perceptual, Motor, and Physical Development. Preschool domains are Approaches to Learning; Social and Emotional Development; Language and Communication; Literacy; Mathematics Development; Scientific Reasoning; and Perceptual, Motor, and Physical Development. Domains are divided into sub-domains with goals that describe broad skills, behaviors, and concepts that are important for school success. Developmental progressions describe the skills, behaviors and concepts that children may demonstrate as they progress. As described in the Head Start Act, the Framework is central to program operations that promote high-quality early learning environments (42 U.S.C. 9832(21)(G)(iv)(II)(aa), 42 U.S.C. 9835(o), 42 U.S.C. 9836(d)(2)(C), 42 U.S.C. 9836a(g)(2)(A), 42 U.S.C. 9837(f)(3)(E), 42 U.S.C. 9837a(a)(3), 42 U.S.C. 9837a(a)(14), 42 U.S.C. 9837b(a)(2)(B)(iii), 42 U.S.C. 9837b(a)(4)(A)(i), and 42 U.S.C. 9837b(a)(4)(B)(iii)).

*Homeless children* means the same as homeless children and youths in Section 725(2) of the McKinney-Vento Homeless Assistance Act at 42 U.S.C. 11434a (2).

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*Home visitor* means the staff member in the home-based program option assigned to work with parents to provide comprehensive services to children and their families through home visits and group socialization activities.

*Hours of planned class operations* means hours when children are scheduled to attend. Professional development, training, orientation, teacher planning, data analysis, parent-teacher conferences, home visits, classroom sanitation, and transportation do not count toward the hours of planned class operations.

*Income* means gross cash income and includes earned income, military income (including pay and allowances, except those described in Section 645(a)(3)(B) of the Act), veteran's benefits, Social Security benefits, unemployment compensation, and public assistance benefits. Additional examples of gross cash income are listed in the definition of "income" which appears in U.S. Bureau of the Census, Current Population Reports, Series P-60-185 (available at <https://www2.census.gov/prod2/popscan/p60-185.pdf>).

*Indian Head Start agency* means a program operated by an Indian tribe (as defined by the Act) or designated by an Indian tribe to operate on its behalf.

*Indian tribe* is defined in the same manner as presented in the Head Start Act, 42 U.S.C. 9801.

*Individualized Education Program* is defined in the same manner as presented in the Individuals with Disabilities Education Act (20 U.S.C. 1400 *et seq.*).

*Individualized Family Service Plan* is defined in the same manner as presented in the Individuals with Disabilities Education Act (20 U.S.C. 1400 *et seq.*).

*Legal status* means the existence of an applicant or grantee as a public agency or organization under the law of the state in which it is located, or existence as a private nonprofit or for-profit agency or organization as a legal entity recognized under the law of the state in which it is located. Existence as a private non-profit agency or organization may be established under applicable state or federal law.

*Local agency responsible for implementing IDEA* means the early intervention service provider under Part C of IDEA and the local educational agency under Part B of IDEA.

*Major renovation* means any individual or collection renovation that has a cost equal to or exceeding \$250,000. It excludes minor renovations and repairs except when they are included in a purchase application.

*Migrant family* means, for purposes of Head Start eligibility, a family with children under the age of compulsory school attendance who changed 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 and whose family income comes primarily from this activity.

*Migrant or Seasonal Head Start Program* means:

- (1) With respect to services for migrant farm workers, a Head Start program that serves families who are engaged in agricultural labor and who have changed their residence from one geographic location to another in the preceding 2-year period; and,

(2) With respect to services for seasonal farmworkers, a Head Start program that serves families who are engaged primarily in seasonal agricultural labor and who have not changed their residence to another geographic location in the preceding 2-year period.

*Minor renovation* means improvements to facilities, which do not meet the definition of major renovation.

*Modular unit* means a portable prefabricated structure made at another location and moved to a site for use by a Head Start grantee to carry out a Head Start program, regardless of the manner or extent to which the modular unit is attached to underlying real property.

*National Driver Register* means the National Highway Traffic Safety Administration's automated system for assisting state driver license officials in obtaining information regarding the driving records of individuals who have been denied licenses for cause; had their licenses denied for cause, had their licenses canceled, revoked, or suspended for cause, or have been convicted of certain serious driving offenses.

*Parent* means a Head Start child's mother or father, other family member who is a primary caregiver, foster parent or authorized caregiver, guardian or the person with whom the child has been placed for purposes of adoption pending a final adoption decree.

*Participant* means a pregnant woman or child who is enrolled in and receives services from a Head Start, an Early Head Start, a Migrant or Seasonal Head Start, or an American Indian and Alaska Native Head Start program.

*Personally identifiable information (PII)* means any information that could identify a specific individual, including but not limited to a child's name, name of a child's family member, street address of the child, social security number, or other information that is linked or linkable to the child.

*Program* means a Head Start, Early Head Start, migrant, seasonal, or tribal program, funded under the Act and carried out by an agency, or delegate agency, to provide ongoing comprehensive child development services.

*Program costs* mean costs incurred in accordance with an approved Head Start budget which directly relate to the provision of program component services, including services to children with disabilities, as set forth and described in the Head Start Program Performance Standards (45 CFR part 1304).

*Purchase* means to buy an existing facility, including outright purchase, down payment or through payments made in satisfaction of a mortgage or other loan agreement, whether principal, interest or an allocated portion principal and/or interest. The use of grant funds to make a payment under a capital lease agreement, as defined in the cost principles, is a purchase subject to these provisions. Purchase also refers to an approved use of Head Start funds to continue paying the cost of purchasing facilities or refinance an existing loan or mortgage beginning in 1987.

*Real property* means land, including land improvements, buildings, structures and all appurtenances thereto, excluding movable machinery and equipment.

*Recruitment area* means that geographic locality within which a Head Start program seeks to enroll

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Head Start children and families. The recruitment area can be the same as the service area or it can be a smaller area or areas within the service area.

*Relevant time period* means:

- (1) The 12 months preceding the month in which the application is submitted; or
- (2) During the calendar year preceding the calendar year in which the application is submitted, whichever more accurately reflects the needs of the family at the time of application.

*Repair* means maintenance that is necessary to keep a Head Start facility in working condition. Repairs do not add significant value to the property or extend its useful life.

*Responsible HHS official* means the official of the Department of Health and Human Services who has authority to make grants under the Act.

*School readiness goals* mean the expectations of children's status and progress across domains of language and literacy development, cognition and general knowledge, approaches to learning, physical well-being and motor development, and social and emotional development that will improve their readiness for kindergarten.

*School bus* means a motor vehicle designed for carrying 11 or more persons (including the driver) and which complies with the Federal Motor Vehicle Safety Standards applicable to school buses.

*Service area* means the geographic area identified in an approved grant application within which a grantee may provide Head Start services.

*Staff* means paid adults who have responsibilities related to children and their families who are enrolled in programs.

*State* is defined in the same manner as presented in the Head Start Act, 42 U.S.C. 9801.

*Termination of a grant or delegate agency agreement* means permanent withdrawal of the grantee's or delegate agency's authority to obligate previously awarded grant funds before that authority would otherwise expire. It also means the voluntary relinquishment of that authority by the grantee or delegate agency. Termination does not include:

- (1) Withdrawal of funds awarded on the basis of the grantee's or delegate agency's underestimate of the unobligated balance in a prior period;
- (2) Refusal by the funding agency to extend a grant or award additional funds (such as refusal to make a competing or noncompeting continuation renewal, extension or supplemental award);
- (3) Withdrawal of the unobligated balance as of the expiration of a grant; and
- (4) Annulment, i.e., voiding of a grant upon determination that the award was obtained fraudulently or was otherwise illegal or invalid from its inception.

*Total approved costs* mean the sum of all costs of the Head Start program approved for a given budget period by the Administration for Children and Families, as indicated on the Financial Assis-

tance Award. Total approved costs consist of the federal share plus any approved non-federal match, including non-federal match above the statutory minimum.

*Transition period* means the three-year time period after December 9, 2011, on the Designation Renewal System during which ACF will convert all of the current continuous Head Start and Early Head Start grants into five-year grants after reviewing each grantee to determine if it meets any of the conditions under §1304.12 of this chapter that require recompetition or if the grantee will receive its first five-year grant non-competitively.

*Transportation services* means the planned transporting of children to and from sites where an agency provides services funded under the Head Start Act. Transportation services can involve the pick-up and discharge of children at regularly scheduled times and pre-arranged sites, including trips between children's homes and program settings. The term includes services provided directly by the Head Start and Early Head Start grantee or delegate agency and services which such agencies arrange to be provided by another organization or an individual. Incidental trips, such as transporting a sick child home before the end of the day, or such as might be required to transport small groups of children to and from necessary services, are not included under the term.

*Verify* or any variance of the word means to check or determine the correctness or truth by investigation or by reference.

## Fiscal Year (FY) 2022 Focus Area One Monitoring Protocol



### Purpose

Focus Area 1 (FA1) is an opportunity for recipients to discuss their program design, management, and governance structure. Recipients will describe the program's approaches to staffing structure, program design, education, health services, family services, fiscal infrastructure, and program governance.



### Approach

The FA1 review is an off-site interview. The review begins with the reviewer conducting a document review using data and reports from the Head Start Enterprise System (HSES) and other sources to learn about the recipient's program design and understand the needs of the children and families the program serves. Prior to the call with the recipient, the reviewer will speak with the recipient's regional program and fiscal specialists for additional context about the program.

Following the document review, the reviewer will conduct a series of off-site telephone interviews with the recipient that occur during a one-week period. These discussions will provide an understanding of the program's design and plans for implementing and ensuring comprehensive, high-quality services that meet the needs of children and families.



### Methodology

**Document Review.** The reviewer will focus on the following listed documents located in the HSES or other available sources:

- Grant application/goals, including the budget
- Program Information Report data
- Community Assessment summary
- Past monitoring data
- Self-Assessment data
- Annual Report
- Audits

**Virtual Discussions.** The reviewer will work with the recipient to identify the appropriate individuals to participate in the off-site discussions (e.g., the governing body, the policy council, managers, and direct service staff).

## Road Map to the FY 2022 Focus Area One Monitoring Protocol

This protocol will guide the discussions between the recipient and the reviewer during the FA1 review. It includes the topic areas for discussion, specific performance areas for assessment, and the federal regulations associated with each area of performance. The protocol is divided into the following five topic areas:

- Program design, management, and quality improvement
- Designing quality education and child development program services
- Designing quality health program services
- Designing quality family and community engagement program services
- Developing effective Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) strategies and fiscal infrastructure

## Outcomes

Recipients will **explain the types of data** collected to measure outcomes for each program area during the FA1 review. The Focus Area 2 (FA2) review event will provide recipients with the opportunity to **share these data** and discuss how the information is used for continuous improvement. During the FA2 review, recipients will demonstrate how the program uses data described in the FA1 review to drive child, family, and programmatic outcomes.

## Federal Regulations

Each section of the protocol includes a list of the federal regulations grounding the discussions. This list ensures transparency regarding the regulations used when assessing program performance. Recipients should note that they remain accountable for all of the Head Start Program Performance Standards (HSPPS) and other federal, state, and local regulations guiding program operations, management, and oversight.

## What We Want to Learn

This section of the protocol outlines the topics for discussions between the reviewer and recipient. We designed the statements and questions listed in this section to stimulate a meaningful discussion that provides recipients with an opportunity to describe the intentionality behind: their program design, decisions, and operations; their challenges and strengths; their strategies for continuous program improvement; and their strategies for creating a workplace culture that promotes diversity, belonging, and inclusion. In addition to learning about recipients' strategies for the next five years, the Office of Head Start (OHS) also wants to learn about how programs are responding and adapting throughout the COVID-19 pandemic.

Questions and statements in the *What We Want to Learn* section are not intended to be exhaustive or to limit discussion. Using these sections as a guide, the reviewer and recipient may engage in discussion beyond the questions included in the protocol.

*Program Design, Management, and Quality Improvement***Overview****Purpose**

Each recipient must design a program that meets the community's needs and ensures a program, fiscal, and human resources structure that provides effective management and oversight of all program areas. This section focuses on the intentionality of the recipient's program design and its ability to address the characteristics, strengths, and needs of children and families they serve. The purpose of this section is to gain a foundational knowledge of the recipient's program design and structure.

**Approach**

The recipient will have the opportunity to share what it has learned about the needs of children and families in its community and how the program design is responsive to those needs and promotes school readiness. The governing body, policy council, and Management Team should be prepared to share lessons learned from the program's internal and external data and how the information ensures quality program services. This section contains three areas for discussion: *the program's understanding of the needs within the community; the program's approach to providing effective management and oversight; and how the policy council and the governing body fulfill their roles and responsibilities.*

**Program Outcomes**

Recipients use data learned from the Community Assessment to inform the grant application based on the needs of the community. However, the community changes over time. OHS is interested in understanding the type of data the recipient collects to understand these changing needs (e.g., natural shifts in the community, natural disasters, public health crises). How does the recipient use that information to adjust its services (e.g., are new services offered; new hours)? As recipients make changes to the program design, how does the program ensure the staffing structure continues to allow for effective oversight and to provide quality services that produce strong outcomes? In addition, the governing body will describe how they use data — both program data and external information — to oversee the provision of quality services for children and families and to ensure progress toward school readiness.

**Federal Regulations**

- 1301.2(a-b) Governing body
- 1301.3(b-c) Policy council and policy committee,
- 1301.5 Training
- 1302.11(b) Determining community strengths, needs, and resources
- 1302.20(a) Determining program structure,
- 1302.101(a-b) Management system
- 1302.102(a-d) Establishing program goals
- 1302.102(b) Monitoring program performance
- 1302.102(c) Using data for continuous improvement
- 1302.102(d) Reporting

## What We Want to Learn

### Program Design

**Performance Measure 1 (PM1):** The recipient's program structure and design is informed by the community's strengths and needs.

1. The recipient will describe how the program took into account various characteristics, such as ethnicity, language, disabilities, mental health, children in foster care, homelessness, and working families, when designing the program. 1302.11(b)(1)
2. The recipient will discuss their agency's strategies for addressing inequities and promoting diversity, belonging, and inclusion among staff, families, and children.
3. The recipient will describe how the program selected program option(s) and program location to meet the needs of children and families. 1302.20(a)(1)
4. The recipient will describe how the program maintains full and effective participation of children who are dual language learners and their families. 1302.101(b)(2)

### Management and Quality Improvement

**PM2:** The recipient has an approach to providing effective management and oversight of all program areas and fiduciary responsibilities.

1. The recipient will discuss how the program, in collaboration with the governing body and the policy council, develops goals for the provision of program services. 1302.102(a)
2. The recipient will describe the process for monitoring program performance and using program data to evaluate progress and risk, and to inform continuous improvement in all program service areas. 1302.102(b)
3. The recipient will discuss how the program plans to supervise staff and provide feedback to inform professional development opportunities and continuous program improvement. 1302.101(a)(2)
  - a. The recipient will share how much of their budget is dedicated toward investing in professional development opportunities for staff.
  - b. The recipient will share the number of staff that have participated in professional development opportunities related to continued education (e.g., credentialing, certificate, and degree programs).
  - c. The recipient will describe what percentage of staff received a compensation increase after obtaining a new credential, certification, or degree.
    - The recipient will share the average compensation increase provided for educational advancements.
4. The recipient will describe the process for using child-level assessment data and other program data to direct ongoing program improvement. 1302.102(c)(2)(ii)
5. The recipient will discuss how program leadership communicates to the program staff, the policy council, and the governing body about program progress. 1302.102(d)
6. The recipient will discuss how the program ensures staffing patterns support the provision of a full range of services. 1302.101(a)(3)

**Program Governance**

**PM3: The recipient maintains a formal structure for program governance that includes a governing body, a policy council (or policy committee for delegates), and parent committees.**

1. The recipient will describe the composition of the governing body and the policy council, and the recipient's strategy for how the members of these bodies support the program. 1301.2(a-b) and 1301.3(b-c)
2. The recipient will describe how the governing body and the policy council are equipped to meet their roles and responsibilities, and to provide effective oversight. 1301.5

## ***Designing Quality Education and Child Development Program Services***

### **Overview**

#### **Purpose**

This section focuses on the program's approach to providing high-quality early education and child development services that promote the cognitive, social, and emotional growth of children, including those with disabilities, for later success in school.

#### **Approach**

The recipient will have the opportunity to describe its strategy for designing and implementing effective teaching practices and implementing safe, well-organized learning environments (and group socialization opportunities in home-based programs) that meet each child's needs. This section contains four areas for discussion: *how the program aligns with school readiness; the program's strategies for ensuring effective teaching practices; how the program supports teachers in promoting school readiness; and how the home-based program option helps parents provide high-quality learning experiences.*

#### **Program Outcomes**

The recipient will describe the data used to assess progress toward meeting the program's school readiness goals and the data used to understand, track, and address children's individual needs. The recipient will also describe how the data are used to inform continuous improvement related to curriculum selection, instruction, and professional development.

**Note:** *Receiving schools refers to schools and programs where enrolled children will attend upon completing the Head Start or Early Head Start program.*

### **Federal Regulations**

- 642(f)(3) Curriculum
- 1302.31(b) Effective teaching practices
- 1302.34(a) Parent and family engagement in education and child development services
- 1302.35(a) Education in home-based programs
- 1302.61(a) Additional services for children with disabilities
- 1302.70(a) Transitions from Early Head Start
- 1302.71(a) Transitions from Head Start to kindergarten
- 1302.91(a) Staff qualifications and competency requirements
- 1302.92(b-c) Training and professional development
- 1302.102(a)(3) School readiness goals

## What We Want to Learn

### Alignment with School Readiness

**PM1: The recipient's approach to school readiness aligns with the expectations of receiving schools, the Head Start Early Learning Outcomes Framework (ELOF), and state early learning standards.**

1. The recipient will describe how the program plans to align with the expectations of receiving schools, the ELOF, and the state early learning standards. 1302.102(a)(3)
2. The recipient will describe how the program plans to support successful transitions for children and their families transitioning out of Early Head Start and Head Start programs 1302.70(a) and 1302.71(a)
3. The recipient will describe why the program chose its curriculum, how it is responsive to the needs of the children, and how the curriculum will help the program meet school readiness goals. 642(f)(3)
4. The recipient will describe how the program supports parents as their children's lifelong educators. 1302.34(a)

### Effective and Intentional Approach to Teaching Practices

**PM2: The recipient has strategies to ensure teaching practices promote progress toward school readiness.**

1. The recipient will describe the program's strategies for ensuring teaching practices are responsive to and build on the developmental progressions of children. 1302.31(b)(1)(ii)
2. The recipient will discuss the program's strategies for providing nurturing and responsive environments for children, including ensuring environments are communication and language rich; promote critical thinking and problem solving; and encourage children's engagement. 1302.31(b)(1)(i)
3. The recipient will describe how education staff provide services for children with disabilities, including making referrals and coordinating evaluations. 1302.61(a)

### Supporting Teachers in Promoting School Readiness

**PM3: The recipient has an approach for ensuring teachers are prepared to implement the curriculum and support children's progress toward school readiness.**

1. The recipient will describe the qualifications required for managers and staff, and if staff currently meet those requirements. 1302.91(a)
2. The recipient will describe how the program assists education staff in using data to individualize learning experiences to improve outcomes for all children. 1302.92(b)(5)
3. The recipient will describe how the program identifies strengths, areas of needed support, and determines which staff would benefit from intensive coaching for all education staff. 1302.92(c)(1)

### Home-based Program Services

**PM4: The recipient has strategies to ensure home-based program services help parents to provide high-quality learning experiences.**

1. The recipient will discuss the strategies for promoting secure parent-child relationships and helping parents provide high-quality learning experiences. 1302.35(a)

## *Designing Quality Health Program Services*

### Overview

#### Purpose

This section focuses on how the recipient provides high-quality health, oral health, mental health, and nutrition services that are developmentally, culturally, and linguistically appropriate and are supportive of each child's growth and school readiness. This section also focuses on the program's approach for maintaining a system of health and safety practices and how the program provides quality services for expectant families.

#### Approach

The reviewer will conduct an off-site interview with the Management Team responsible for ensuring the delivery of high-quality health, oral health, mental health, and nutrition services. The reviewer will also ask how the recipient ensures children's safety.

#### Program Outcomes

The recipient will share the type of data used to understand child health outcomes and describe how the data are used along with the expertise of the Health Services Advisory Committee (HSAC) to inform continuous improvement.

### Federal Regulations

- 1302.40(b) Health Services Advisory Committee (HSAC)
- 1302.42(a-d) Child health status and care
- 1302.45(b)(1-3) Mental health consultants
- 1302.47(b)(1-4) Safety practices
- 648A(g)(3) Staff recruitment and selection procedures: criminal record checks
- 1302.90(c) Standards of Conduct
- 1302.17(a)(1-4) and (b)(1-3) Suspension and expulsion

### What We Want to Learn

#### Child Health Status and Care

**PM1: The recipient has an approach to ensuring delivery of high-quality health services.**

1. The recipient will describe the program's strategy for effectively monitoring and maintaining timely information on children's health status and care, including ongoing sources of health care, preventive care, and follow-up.
2. The recipient will discuss the approach to ensuring children have continuous ongoing health care. 1302.42(a)
3. The recipient will discuss the approach to ensuring children are up to date on a schedule of age-appropriate preventive and primary medical and oral health care. 1302.42(b)(1)(i)
4. The recipient will discuss the approach to ensuring ongoing care and extended follow-up care. 1302.42(c-d)

5. The recipient will describe how the program leverages expertise of the HSAC, including Head Start parents, health professionals, and community members, to learn about and support each child's health and mental health needs. 1302.40(b)
6. The recipient will describe how the program secures a mental health consultant to implement strategies to support children with mental health and social and emotional concerns. 1302.45(b)(1)
7. The recipient will describe how they use the mental health consultant to support children, staff, and families in meeting mental health and social and emotional needs. 1302.45(b)(3)
8. Does the program prohibit or severely limit the use of suspension due to a child's behavior?  
1302.17(a)(1-4) and (b)(1-3)

### Health and Safety Practices

**PM2: The recipient has strategies for maintaining healthy and safe environments and for ensuring all staff have complete background checks.**

1. The recipient will describe their approach to mitigating the spread of COVID-19 within their program (e.g., ventilation, sharing resources on vaccinations).
2. The recipient will describe the program's approach to ensuring safe learning environments (e.g., indoor and outdoor facilities, equipment, materials are safe and free of environmental toxins). 1302.47(b)(1)(ix) and (b)(2)(v)
3. The recipient will describe their process for lead inspections.
4. The recipient will describe the program's strategy for training staff on safety practices and procedures.  
1302.47(b)(4)
5. The recipient will describe how they plan to ensure all staff abide by the program's Standards of Conduct.  
1302.90(c)
6. The recipient will describe the program's process for ensuring all staff have background checks, including the timeliness of the background checks. 648A(g)(3)

## *Designing Quality Family and Community Engagement Program Services*

### Overview

#### Purpose

The recipient must integrate parent and family engagement strategies into all systems and program services to support family well-being and promote children's learning and development. Programs are encouraged to develop innovative two-generation approaches that address prevalent needs of families across their program and leverage community partnerships or other funding sources.

#### Approach

During the off-site interview, the program will provide information about its strategy for integrating high-quality family engagement services into all areas of programming that are responsive to the needs of families. The recipient will have the opportunity to discuss the expected outcomes for families and how the program design supports achieving those outcomes. This section contains two areas for discussion: *the program's approach for collaborating with families* and *for providing services that strengthen parenting skills*.

#### Recipient Outcome

The recipient will describe how the program determines the resources needed to support family well-being, either within the program or through community partnerships. This includes sharing how the program measures the impact of family support services.

### Federal Regulations

1302.51(a-b) Parent activities to promote child learning and development

1302.52(c) Family partnership services

1302.53(a)(1) Community partnerships

### What We Want to Learn

#### Family Well-Being

**PM1: The recipient has an approach for collaborating with families to support family well-being.**

1. The recipient will describe any lessons learned or enhancements the program has made and maintained during the pandemic to foster family engagement throughout the COVID-19 pandemic.
2. The recipient will describe the approach to supporting family goal-setting and tracking family strengths, needs, and progress toward goals. 1302.52(c)(3)
  - a. The recipient will quantify the number of families that have worked with the program to develop a family partnership goal in the following categories within the last 12 months:

- Education
- Housing assistance
- Employment opportunities/job training
- Other
- Parenting education
- Health education
- Financial education

- b. The recipient will describe the goals families are working to achieve and share how many families have completed at least one goal.
3. The recipient will describe the strategies for obtaining resources that support family well-being, either within the program or through community partnerships. 1302.53(a)(1)
4. The recipient will describe the program's approach to addressing food insecurities, including barriers and partnerships.
5. The recipient will describe the program's most impactful community partnership and describe how that partnership has positively influenced the community they serve.

### Strengthening Parenting and Parent-Child Supports

**PM2: The recipient has an approach to providing services that strengthen parenting skills.**

6. The recipient will describe how the program plans to support parents in strengthening parenting skills. 1302.51(a)
7. The recipient will describe how the program is implementing a parenting curriculum. 1302.51(b)

***Developing Effective ERSEA Strategies and Fiscal Infrastructure*****Overview****Purpose**

In this section, the recipient will describe how the program's recruitment and selection strategies are responsive to the needs of the community's eligible children and families, and the strategy for maintaining their funded enrollment level. The recipient will also provide information about the program's fiscal capacity and financial infrastructure.

**Approach**

The reviewer will discuss the program's strategy for recruiting and selecting eligible children and families. The program will describe the process for maintaining enrollment and for ensuring children and families meet eligibility requirements. The recipient will describe how the program ensures its own internal monitoring against fraud, waste, and abuse. The fiscal representative will also discuss how the program supports the accomplishment of program goals and effectively oversees program funds and property through qualified fiscal personnel and a responsive budget.

**Outcomes**

The recipient will share information about ERSEA practices and how data are used to ensure the program maintains funded enrollment based on eligibility criteria. The recipient will describe what data are used and how to inform the development and refinement of the program's budget. The recipient will also share how the program uses data to determine the effectiveness of the program's fiscal infrastructure.

**Federal Regulations**

- 1302.12 Determining, verifying, and documenting eligibility
- 1302.13 Recruitment of children
- 1302.14(a) and (c) Selection process and children eligible for services under the Individuals with Disabilities Education Act (IDEA)
- 1302.15(a) Funded enrollment
- 1302.91(a) and (c) Staff qualifications and competency requirements
- 1302.102(d)(i) Status reporting to governing body and policy council
- 75.308 Revision of budget and program plans
- 642(c)(1)(E)(iv)(VII)(aa-bb) Governing body responsibilities
- 642(c)(2)(D)(iii-iv) Policy council responsibilities

**What We Want to Learn****Eligibility, Recruitment, Selection, Enrollment, and Attendance**

PM1: The recipient enrolls children or expectant families who are categorically eligible or who meet defined income-eligibility requirements.

1. The recipient will describe how staff verify eligibility and how the program maintains eligibility records, including:
  - o How copies of any documents or statements, including declarations, that are necessary to verify eligibility are collected and maintained. 1302.12(k)(2)(i)
  - o How program staff make reasonable efforts to verify eligibility by conducting either an in-person or telephone interview with the family. 1302.12(k)(2)(ii)
  - o How program staff collect statements that identify whether the family or expectant family meets the following eligibility requirements. 1302.12(c)(1-2), (d)(1), and (e)(1)(iii)
    - Income is equal to or below the poverty line
    - Receiving or is eligible to receive public assistance (Supplemental Security Income and Temporary Assistance for Needy Families)
    - Experiencing homelessness
    - In foster care
    - Included in the 10% of children enrolled in the program above the income threshold
    - Included in the 35% of children who are not categorically eligible whose family income is between 100% and 130% of poverty

*Note: For tribal programs, there are additional allowances provided under 1302.12(e).*

2. The recipient will describe how the program ensures staff verifies and reviews all of the documents available for determining eligibility. 1302.12(a)(ii)
3. The recipient will discuss the procedure for managing over-income applicants.
4. The recipient will describe the process for validating the accuracy of the initial determination of eligibility.
5. The recipient will describe how the program ensures staff receive ERSEA training and comply with eligibility determination regulations, including having policies and procedures in place to describe actions taken against staff who violate these regulations. 1302.12(l-m)

PM2: At least 10% of the recipient's funded enrollment is filled by children eligible for services under Individuals with Disabilities Education Act (IDEA) or the recipient has received a waiver.

1. The recipient will share the percentage of children enrolled under IDEA, or that the recipient has received a waiver. 1302.14(b)(1)

## Enrollment Verification

**PM3: The recipient maintains and tracks full enrollment for all enrolled participants.**

1. The recipient will describe the process for determining when a slot is vacant.
2. The recipient will describe the process for removing children or expectant mothers whose slot is determined vacant from the enrollment numbers reported in the HSES. 1302.15(a)
3. The recipient will describe the process for filling slots that have been vacant for 30 days and will provide data on the number of vacant slots, the length of time vacant, and the reason why the slot is vacant. 1302.15(a)
4. The recipient will describe the availability and use of a waitlist that ranks children according to the selection criteria. 1302.14(c)
5. The program will describe their process for tracking interactions with expectant families, including the services expectant mothers and their families may receive from community partners.

## Fiscal Infrastructure, Capacity, and Responsiveness

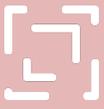
**PM1: The recipient's fiscal staff have the qualifications needed to provide oversight of the grant.**

1. The recipient will describe the fiscal complexity of the program and applicable financial management requirements, including the existence of multiple funding sources.
2. The recipient will describe the process for staffing fiscal responsibilities and how the staffing meets the financial management needs of the organization. 1302.91(a)
3. Does the fiscal officer have the required qualifications if hired after November 2016? 1302.91(c)
4. The recipient will describe how the staff develop and deliver usable financial information to the governing body and the policy council to inform their fiscal decision-making. 1302.102(d)(1)(i)
5. The recipient will describe the program's process for assuring that funds awarded to prevent, prepare for, and respond to COVID-19 (e.g., Coronavirus Aid, Relief, and Economic Security Act and Coronavirus Response and Relief Supplemental Appropriations Act) are used only for their appropriated purposes.

**PM2: The recipient has a budget development and revision process that includes stakeholders and appropriate approvals, and ensures continuous alignment with program design, goals, and objectives.**

6. The recipient will describe the budget development process, including:
  - o Who is involved. 642(c)(1)(E)(iv)(VII)(aa-bb) [governing body] and 642(c)(2)(D)(iii-iv) [policy council]
  - o How the budget aligns with the program's design and goals. 1302.101(a)(3)
  - o The recipient's process for tracking the budget, making revisions, and obtaining required approvals in compliance with federal regulations. 75.308; 642(c)(1)(E)(iv)(VII)(aa)

## Fiscal Year (FY) 2022 Focus Area Two Monitoring Protocol



### Purpose

The Focus Area 2 (FA2) review is an opportunity for recipients to demonstrate their effectiveness in implementing a high-quality program to promote positive outcomes and school readiness for children and their families. This focus area is designed to broaden the Office of Head Start's (OHS) understanding of each recipient's performance and to determine if programs are meeting the requirements of the Head Start Program Performance Standards (HSPPS), Uniform Guidance, and the Head Start Act.



### Road Map to the Focus Area Two Protocol

This protocol will guide the discussions between the recipient and reviewers during the FA2 review. It includes areas of discussion, specific performance measures, and the associated federal regulations. The protocol is divided into the following six sections:

- Program Design, Management, and Quality Improvement
- Education and Child Development Services
- Health Program Services
- Family and Community Engagement Services
- Fiscal Infrastructure
- Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA)

### Federal Regulations

Each section of the protocol includes a list of federal regulations grounding the discussions. This list ensures transparency regarding the regulations used to assess program performance. Recipients should note that they remain accountable for all the HSPPS as well as other federal, state, and local regulations guiding program operations, management, and oversight.

### What We Want to Learn

This section of the protocol outlines the topic areas the reviewers will explore and the methodologies reviewers will use to learn about recipient performance (e.g., data tours, explorations of classrooms, discussions with managers, teachers, parents, and the governing body). The statements and questions listed in this section are designed to stimulate a meaningful discussion that provides recipients with an opportunity to describe: the intentionality behind their program design, decisions, and operations; the challenges they have experienced; the strengths they have developed; their strategies for continuous program improvement; and their strategies for creating a workplace culture that promotes diversity, belonging, and inclusion. In addition, OHS wants to learn about how programs are responding and adapting throughout the COVID-19 pandemic.

The questions and statements in the *What We Want to Learn* section are not intended to be exhaustive or to limit discussion. Using these sections as a guide, the reviewers and the recipient may engage in discussions beyond the questions included in the protocol.

## New in FY 2022 Outcomes

The FA2 review event will provide recipients with the opportunity to share the types of data collected to measure outcomes for each program area. In addition, the recipient will share the outcomes the program has achieved thus far in each service area, strategic refinements the program is making to ensure continuous improvement, and the progress made toward achieving outcomes.

## Performance Measures in the Monitoring Protocol

The performance measures identify the areas of performance that are the focus of the monitoring protocol. Each performance measure indicates the federal regulations associated with that measure.

## Focus Area Two Review Information

Recipients participating in the FA2 review will receive notification (**45-day letter**) of the upcoming review. The assigned review lead will contact the recipient following the notification and will partner with the program to prepare for the review (**planning call**).

The Review Team responsible for conducting the FA2 review consists of a review lead, a fiscal reviewer, and two FA2 reviewers. The FA2 review includes, but is not limited to, the sample ERSEA file review (includes children and expectant families), classroom explorations, data tours, Management Team discussions, governing body and policy council discussions, and fiscal exploration. The Review Team will meet the recipient's Management Team the morning of the first day of the review. This **Management Team meeting** allows the Review Team to build on knowledge learned from the pre-site document review (e.g., grant application, Program Information Report data, etc.) and conversations with the Regional Office.

**Data tours** start on the first day and allow the Review Team to understand the types of data the recipient collects to inform ongoing continuous improvement. Program leadership and managers overseeing health, fiscal, education, and family services will demonstrate how data are used and how each service area collaborates to ensure the provision of quality services. They also will share data that show progress toward achieving results and outcomes in each service area.

**Service area explorations** continue through the week. Discussions will occur with families, direct service staff, the director, managers, the governing body, and the policy council to gain further insight about how children and their families are supported.

## *Program Management and Quality Improvement*

### Overview

#### Purpose

The Program Management and Quality Improvement section of the protocol includes three areas: program management, ongoing oversight and continuous improvement, and program governance. The Review Team will listen to discussion and review data to understand the ability of the Director and the Management Team to deliver high-quality services, continuously monitor program services, make improvements as needed, and achieve program goals and desired outcomes. The Review Team will also monitor the engagement of the governing body and the policy council.

#### Approach

The Program Management and Quality Improvement discussion with the Management Team begins on the first day of the FA2 review event. The recipient will describe and demonstrate how they implement their program management system to promote quality improvement. During the data tours, the Review Team will review data and have discussions with program management staff about the program's progress, implementation, success, and risks.

#### Program Outcomes

The recipient will share how the program collects data to monitor its own progress in achieving outcomes, as well as the program's reported achievements to date in each content area. The discussion includes a focus on where the program is making progress, where the program is experiencing challenges, and how the program uses its data to inform continuous improvement across the program. In addition, the governing body will demonstrate how they use data (both program data and external information) to oversee the provision of quality services for children and families and to ensure progress toward school readiness.

### Federal Regulations

- 1301.2 Governing body use of information and data
- 1301.3 Policy council and policy committee use of information and data
- 1302.91(a) Staff qualifications and competencies
- 1302.92(b) Staff training and professional development
- 1302.101(a)-(b) Management system implementation and coordinated approaches
- 1302.102(b) Monitoring program performance
- 1302.102(c) Using data for ongoing improvement
- 1302.102(d) Reporting
- 642(c)(1)(E)(ii) and (c)(1)(E)(iv)(V)(bb) Governing body responsibilities
- 642(c)(2)(D)(i) Policy council responsibilities

## What We Want to Learn

### Program Management

**PM 1: The recipient establishes a management structure that consists of staff, consultants, or contractors who ensure high-quality service delivery; have sufficient knowledge, training, experience, and competencies to fulfill the roles and responsibilities of their positions; and provide regular supervision and support to staff.**

1. The recipient will demonstrate how the Management Team members use their knowledge, training, experience, and competencies to ensure high-quality service delivery. 1302.91(a)
2. The recipient will demonstrate how the management/organizational structure provides effective management and oversight of all program areas. 1302.101(a)(1)
3. The recipient will demonstrate how managers provide ongoing supervision and professional development to support individual staff. 1302.101(a)(2) and 1302.92(b)
  - a. The recipient will share how much of their budget is dedicated toward investing in professional development opportunities for staff.
  - b. The recipient will share the number of staff that have participated in professional development opportunities related to continued education (e.g., credentialing, certificate, and degree programs).
  - c. The recipient will demonstrate what percentage of staff received a compensation increase after obtaining a new credential, certification, or degree.
    - i. The recipient will share the average compensation increase provided for educational advancements.

### Ongoing Monitoring and Continuous Improvement

**PM2: The recipient uses data to identify program strengths, needs, and areas needing improvement; to evaluate progress toward achieving program goals and compliance with program performance standards; and to assess the effectiveness of professional development.**

1. The recipient will demonstrate how data are aggregated, analyzed, and compared to inform strategies for continuous improvement in all service areas and to identify risk. 1302.102(c)(2)(i)
2. The recipient will demonstrate how information is used for ongoing monitoring and improvement of teaching practices, child-level assessments, family outcomes, health and safety practices, and other comprehensive services. 1302.102(c)(2)(iv)
3. The recipient will demonstrate how information is provided to the director and across the Management Team to support coordination between services.
4. The recipient will demonstrate how the program evaluates progress toward meeting program goals. 1302.102(b)(1)(i)
5. The recipient will demonstrate how the program maintains full and effective participation of children who are dual language learners and their families. 1302.101(b)(2)
6. The recipient will discuss their agency's strategies for addressing inequities and promoting diversity, belonging, and inclusion among staff, families, and children.

### Program Governance

**PM3: The recipient maintains a formal structure of program governance to oversee the quality of services for children and families, and to make decisions related to program design and implementation.**

1. The governing body members will demonstrate how they have adopted practices that ensure active, independent, and informed governance of the Head Start agency. 642(c)(1)(E)(ii)
2. The governing body members will demonstrate how they use data — both program data and external information — to oversee the provision of quality services for children and families and to ensure progress toward school readiness. 1301.2(b)(2)
3. The governing body members will discuss how they oversee the agency’s progress in carrying out programmatic provisions of the agency’s grant application. 642(c)(1)(E)(iv)(V)(bb)

**PM4: The recipient’s policy council is engaged in the direction of the program, including program design and planning of goals and objectives.**

1. The policy council members will demonstrate how they support active involvement of parents in program operations and how they ensure the agency is responsive to community and parent needs. 642(c)(2)(D)(i)
2. The policy council members will describe the type of information they use to ensure the program is delivering quality services and the ways in which they actively participate in the direction of the program. 1302.102(d); 1301.3(c)(2)

***Note:** The fiscal responsibilities of the governing body and the policy council are addressed under the fiscal section of the protocol.*

## Monitoring and Implementing Quality Education and Child Development Services

### Overview

#### Purpose

The Quality Education and Child Development Services section explores four areas: *school readiness efforts; teaching practices that promote progress toward the next learning environment; support for teachers in school readiness efforts; and the quality of home-based services*. These sections are interrelated and collectively provide information about the program's ability to prepare children for their next learning environment.

#### Approach

The recipient will describe how the program's school readiness efforts align with the expectations of the children's receiving schools and if they have information from the kindergarten readiness assessment of the receiving schools. OHS wants to capture rich data around this topic area. The openness of the questions gives the program the opportunity to describe how their school readiness and transition efforts are based on the needs of the children enrolled in their program.

#### Program Outcomes

The recipient will share the data used to assess progress toward meeting the program's school readiness goals, and the data used to understand, track, and address children's individual needs. The recipient will also demonstrate how the data are used to inform continuous improvement related to curriculum selection, instruction, and professional development.

**Note:** *Receiving schools refers to schools and programs where enrolled children will attend upon completing the Head Start or Early Head Start program.*

### Federal Regulations

1302.31(b)(1) and (e) Effective teaching practices

1302.31(e) Promoting learning through approaches to rest, meals, routines, and physical activity

1302.32(a)(2) Curricula

1302.33(b)(1-2) Assessment for individualization

1302.35(a), (c), and (e) Education in home-based programs

1302.45(a)(1) and (b)(2) Support with managing challenging behaviors and other social, emotional, and mental health concerns

1302.45(b)(2) Mental health consultants

1302.61(a) Additional services for children with disabilities

1302.70(a) Transitions from Early Head Start

1302.71(a) and (d) Transitions from Head Start to kindergarten

1302.71(d) Learning environment activities

1302.91(e) Staff qualifications

1302.92(b)(5) and (c)(1) Training and professional development

1302.92(c)(1) Coaching

1302.102(a)(3) and (c)(2)(ii-iii) School readiness goals  
1302.102(c)(2)(ii)-(iii) Using data for continuous improvement

## What We Want to Learn

### Alignment with School Readiness

**PM1: School readiness efforts align with the expectations of receiving schools, the Head Start Early Learning Outcomes Framework (HSELOF), and state early learning standards.**

1. The recipient will describe how the program's school readiness efforts align with the expectations of receiving schools, the ELOF, and the state early learning standards. 1302.102(a)(3)
2. The recipient will explain the expectations of the receiving schools and collaborations to promote successful transitions to kindergarten. 1302.71(a)
3. The recipient will demonstrate how the program implements strategies and practices to support successful transitions for children and families out of the Early Head Start program. 1302.70(a)
4. The recipient will describe the data used to show that children are ready to meet the expectations of receiving schools. 1302.102(c)(2)(ii)-(iii) and 1302.33(b)(1)
5. The recipient will explain the expectations of the kindergarten readiness assessment of the receiving schools.
6. The recipient will discuss if the program obtains kindergarten entry assessment data on Head Start children entering the receiving schools.

**Note:** *The information on kindergarten readiness assessment (questions 5 and 6) is used for OHS data collection purposes only to inform policy and training and technical assistance directions.*

### Effective and Intentional Teaching Practices

**PM2: Teaching practices intentionally promote progress toward school readiness and provide high-quality learning experiences for children.**

1. The recipient will demonstrate how organized activities, schedules, lesson plans, and learning experiences are responsive to the children's individual developmental patterns and progressions as described in the ELOF. 1302.31(b)(1)(ii)
2. Using ongoing child-level assessment data, the recipient will demonstrate how teachers individualize the experiences, instruction strategies, and services to support children, including those who are not making progress toward school readiness. 1302.33(b)(2)
3. The recipient will demonstrate how teachers create nurturing and responsive learning environments for children, including ensuring environments promote critical thinking and problem solving, encourage children's engagement, and are communication and language rich. 1302.31(b)(1)(i)
4. The recipient will share and demonstrate how teachers support child-teacher interactions, socialization, development, and learning at all times, including during daily routines and mealtimes. 1302.31(e)
5. The recipient will demonstrate how education staff provide services for children with disabilities, including making referrals and coordinating evaluations. 1302.61(a)
6. The recipient will demonstrate the strategies that teachers use to promote successful transitions for children to kindergarten. 1302.71(d)
7. The recipient will demonstrate how teachers are supported in providing effective classroom management and positive learning environments. 1302.45(a)(1)

### Supporting Teachers in Promoting School Readiness

**PM3: The recipient ensures teachers are prepared to implement the curriculum and support children's progress toward school readiness.**

1. The recipient will demonstrate how the program assists education staff in using data to individualize learning experiences to improve outcomes for all children. 1302.92(b)(5)
2. The recipient will demonstrate how the program supports staff in effectively implementing curricula, monitoring curriculum implementation, and ensuring fidelity. 1302.32(a)(2)
3. The recipient will demonstrate how the program identifies strengths, areas of needed support, and which education staff would benefit from intensive coaching. 1302.92(c)(1)
4. The recipient will demonstrate how the mental health consultant supports teaching practices through strategies to address teacher and individual child needs. 1302.45(b)(2)
5. The recipient will demonstrate that teachers have the appropriate qualifications. 1302.91(e)(1-2)

### Home-Based Program Services

**PM4: The recipient ensures home-based program services provide home visits and group socialization activities that provide high-quality learning experiences.**

1. The recipient will demonstrate how the home-based program services:
  - a. Promote secure parent-child relationships and help parents provide high-quality early learning experiences. 45 CFR §1302.35(a)
  - b. Provide developmentally appropriate, child-focused learning experiences that promote parents' abilities to support their children's development and align intentionally to school readiness goals and the ELOF (home visits and socializations). 1302.35(c) and (e)(2)

## Monitoring and Implementing Quality Health Services

### Overview

#### Purpose

This section focuses on how the recipient provides high-quality health, oral health, mental health, and nutrition services that are supportive of each child's growth and school readiness. This section also focuses on the program's approach for maintaining a system of health and safety practices and how the recipient provides quality services for expectant families.

#### Approach

Recipients will share how the program supports, implements, and monitors high-quality health program services. Management staff will share the data they use to monitor the quality of health services and to ensure health, mental health, and dental needs are met in a timely manner. Reviewers will ask the recipient to demonstrate how the program ensures environments for children and families are well maintained and support the desired outcomes for children. *During the health data tour, the recipient will describe and demonstrate how the program monitors and maintains child health-related information and supports parents in understanding information about their children's health and well-being.*

Additionally, staff will demonstrate the effectiveness of health and safety practices and discuss how these practices ultimately keep children and families healthy and safe. Five areas are measured in this section: *timely health care and follow-up; mental health consultation; oral health and nutrition; safety; and services to expectant families.*

#### Program Outcomes

The recipient will share the data used to understand child health outcomes and to ensure the successful implementation of safety practices.

### Federal Regulations

- 1302.41(a) Collaboration and communication with parents
- 1302.42(a-d) Child health status and care
- 1302.43 Oral health practices
- 1302.44(a) Child nutrition
- 1302.45(a-b) Wellness promotion
- 1302.45(b) Mental health consultants
- 1302.47(b) Safety practices
- 1302.80 Enrolled pregnant women
- 1302.81 Prenatal and postpartum information, education, and services
- 1302.90(c) Standards of conduct
- 648A(g)(3) Staff recruitment and selection procedures: criminal record checks
- 1302.17(a)(1-4) and (b)(1-3) Suspension and expulsion

## What We Want to Learn

### Child Health Status and Care

**PM1: The recipient effectively monitors and maintains timely information on children's health status and care, including ongoing sources of health care, preventive care, and follow-up.**

1. Does the recipient ensure children are up to date on a schedule of age-appropriate medical and oral health care (Early and Periodic Screening, Diagnostic and Treatment [EPSDT])? 1302.42(b)(1)(i)
2. Does the recipient ensure ongoing care and extended follow-up care? 1302.42(c)-(d)
3. Does the recipient ensure that each child has an ongoing source of continuous health care? 1302.42(a)(1)
4. Does the recipient educate, support, and collaborate with parents to share information about a child's health and well-being? 1302.41(a)

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*During the health data tour, the recipient will describe and demonstrate how the program:*

- *Monitors and maintains child health-related information*
  - *Supports parents in understanding information about their children's health and well-being*
- 

### Mental Health

**PM2: The recipient supports a program-wide culture that promotes mental health and social and emotional well-being and uses mental health consultation to support staff.**

1. Does the recipient ensure mental health consultation is available to partner with staff and families in a timely and effective manner? 1302.45(a)(2)
2. The recipient will describe how they use the mental health consultant(s) to support children, staff, and families in meeting mental health and social and emotional needs. 1302.45(b)(3)
3. Does the program prohibit or severely limit the use of suspension due to a child's behavior? 1302.17(a)(1-4) and (b)(1-3)

### Oral Health and Nutrition

**PM3: The recipient maintains and monitors for effective oral health practices and nutrition services that meet the nutritional needs and accommodate feeding requirements and allergies.**

1. Does the recipient promote effective oral health hygiene by ensuring children with teeth are assisted in brushing their teeth once a day? 1302.43
2. Does the recipient implement nutrition services that are culturally and developmentally appropriate, including meeting the nutritional and feeding needs of babies and young children? 1302.44(a)(1)
3. Does the recipient post individual child food allergies prominently where staff can view wherever food is served? 1302.47(b)(7)(vi)

### Safety Practices

**PM4: The recipient has implemented a process for monitoring and maintaining healthy and safe environments. This includes ensuring all staff have complete background checks.**

1. The recipient will describe their approach to mitigating the spread of COVID-19 within their program (e.g., ventilation, sharing resources on vaccinations).

2. The recipient will demonstrate how facilities are free from environmental toxins and hazards that pose risk to children's health and development, and how the program keeps all facilities safe through an ongoing system of preventive maintenance. 1302.47(b)(1)(ix)
3. The recipient will describe their process for lead inspections.
4. The recipient will demonstrate how the program keeps all equipment and materials safe through an ongoing system of preventive maintenance. 1302.47(b)(2)(v)
5. Does the recipient report suspected or known child abuse and neglect? 1302.47(b)(5)(i)
6. Does the recipient ensure safe sleep practices? 1302.47(b)(5)(ii)
7. Does the recipient ensure appropriate indoor and outdoor supervision? 1302.47(b)(5)(iii)
8. Does the recipient only release children to an authorized adult? 1302.47(b)(5)(iv)
9. Does the recipient prevent maltreatment or endangerment of children? 1302.90(c)
10. The recipient will describe its method for ensuring all staff have completed the background checks prior to hire. If programs are not ensuring staff receive background checks prior to hire, please note the reasons why, how many staff did not get the criminal record check before hire and review the written documentation they have to validate all staff have the required checks. List all staff that did not have a background check. 648A(g)(3)

### Services to Expectant Families

**PM5: For programs serving expectant families, the recipient provides and monitors for quality services that facilitate enrolled expectant mother's access to health care and provide information to support prenatal, postpartum, maternal, and infant health and emotional well-being.**

1. The recipient will describe how the program connects women to comprehensive services and conducting newborn visits. 1302.80
2. The recipient will describe how the program provides prenatal and postnatal education, supports parents during pregnancy, and works to reduce stress and maternal depression. 1302.81

## Monitoring and Implementing Quality Family and Community Engagement Services

### Overview

#### Purpose

The recipient must integrate parent and family engagement strategies into all systems and program services to support family well-being and promote children's learning and development. Programs are encouraged to develop innovative two-generation approaches that address prevalent needs of families across their program and leverage community partnerships or other funding sources.

#### Approach

The recipient will demonstrate how the program provides quality family and community engagement services. The Review Team will learn how the program provides services to support family well-being and promote school readiness. Management and family services staff will describe how they support families in making progress toward their life goals. Parents will discuss their experience with the program's family engagement and support services. Reviewers will use information learned from each program area to understand how the recipient integrates family engagement into all areas of programming. Three areas are measured in this section: *family well-being; strengthening parents; and parent engagement in education.*

#### Program Outcomes

The recipient will demonstrate how the program determines the resources needed to support family well-being, either within the program or through community partnerships. This includes sharing how the program measures the impact of family support services.

### Federal Regulations

- 1302.34(b) Engaging parents and family members
- 1302.45(b) Mental health consultants
- 1302.46(b) Family support services for health, nutrition, and mental health
- 1302.50 Family engagement approach
- 1302.51 Parent activities to promote child learning and development
- 1302.52 Family partnership services
- 1302.53 Community partnerships
- 1302.62(b) Parents of children eligible for services under the Individuals with Disabilities Education Act (IDEA)
- 1302.71(b) Family collaborations for transitions

### What We Want to Learn

#### Family Well-Being

**PM1: The recipient collaborates with families to support family well-being, parents' aspirations, and parents' life goals.**

1. The recipient will demonstrate how the program supports family goal-setting and tracks family strengths, needs, and progress toward goals. 1302.52(c)(3)
  - a. The recipient will quantify the number of families that have worked with the program to develop a family partnership goal in the following categories within the last 12 months:

- Education
  - Housing assistance
  - Employment opportunities/Job Training
  - Other
  - Parenting Education
  - Health Education
  - Financial Education
- b. The recipient will describe the goals families are working to achieve and share how many families have completed at least one goal.
2. The recipient will demonstrate how the program provides resources that support family well-being, either within the program or through community partnerships.
- a. Does the recipient provide economic mobility resources to help families with pathways out of poverty (including educational, vocational, and employment opportunities; budgeting; debt counseling; tax credits; savings accounts; etc.)? 1302.50(b)(3)
  - b. Does the recipient provide health and mental health resources (including health insurance or referrals for parental depression, domestic violence, substance misuse, etc.)? 1302.45(b)(5)
  - c. Does the recipient provide resources and support for families experiencing homelessness? 1302.53(a)(2)(vi)
  - d. The recipient will describe the program's approach to addressing food insecurities (including barriers and partnerships).
  - e. The recipient will describe the program's most impactful community partnership and demonstrate how that partnership has positively influenced the community they serve.

### Strengthening Parenting and Parent-Child Supports

**PM2: The recipient provides services that strengthen parent-child relationships and support parents in strengthening parenting skills.**

1. The recipient will describe its family engagement strategies and how they are designed to foster parental confidence, including opportunities to connect with other parents. 1302.51(a)
2. The recipient will describe how the program offers parents the opportunity to practice parenting skills, build on their knowledge, and participate in a parenting curriculum. 1302.51(b)

### Family Engagement in Education and Child Development Services

**PM3: The recipient's education and child development services recognize parents' roles as children's lifelong educators and encourage parents to engage in their child's education.**

1. The recipient will describe any enhancements the program has maintained to its approach to providing family services and fostering family engagement in a virtual environment.
2. The recipient will describe how the program helps parents support the learning and development of their children. 1302.50(b)(1)
3. The recipient will describe how the program shares information with parents about their child's development and the types of information the recipient gathers from parents about their child's development. 1302.34(b)(2)
4. The recipient will describe how the program supports families in their transition into and out of the Head Start program. 1302.71(b)(2)
5. The recipient will describe how the program prepares parents to advocate for their child. 1302.71(b)(1)
6. The recipient will describe how the program supports parents of children with disabilities. 1302.62(b)
7. The recipient will describe how the program supports parents in promoting the social and emotional development of their child. 1302.46(b)(1)

## Monitoring and Implementing Fiscal Infrastructure

### Overview

#### Purpose

This section highlights the program’s intentionality in its fiscal capacity and management; how the program shares information with the director, managers, the governing body, and the policy council; and how the program uses data to make sound fiscal decisions and ensure fiscal and legal accountability.

#### Approach

The recipient will demonstrate the program’s development of its annual operating budget and strategies for the budget’s implementation, adjustments, and accountability.

#### Outcomes

The recipient will describe what data are used and how to inform the development and refinement of the program’s budget. The recipient will also share how the program uses data to determine the effectiveness of the program’s fiscal infrastructure.

### Federal Regulations

Budget Planning and Development	Ongoing Fiscal Capacity	Budget Execution	Budget Execution cont’d	Facilities
1302.101(a)(3)	1302.91(c)	653(a)	75.303(c)	75.308(c)(1)(xi)
642(c)(1)(E)(iv)(VII)(aa)	1303.12	75.414	75.303(d)	1303.46(b)(1)-(4)
642(c)(1)(E)(iv)(VII)(bb)	75.303(a),(b),(e)	75.430(i)	75.302(b)(7)	75.320(d)(2)
642(d)(2)(A)-(I)		75.405(a)	75.403(a)-(g)	75.343
642(d)(3)		75.302(b)(4)	75.329(a)-(b)	
642(c)(2)(D)(iv)		75.302(b)(3)	75.332	
1302.102(b)(1)(iii)		75.305(b)(1)	75.327(h)	
1302.102(d)(1)(i)		75.441	75.328(a)(4)(5)(7)	
			75.328(c)-(d)	

### What We Want to Learn

#### Budget Planning and Development

PM1: The recipient develops and implements its budget to sustain management, staffing structures, and the delivery of services that support the needs of enrolled children and families. This entails relating financial data to accomplishments of the grant award and an awareness of program progress, lessons learned, and needed improvements.

1. The recipient will describe how it takes into account the program's goals and objectives when developing the budget to ensure the provision of comprehensive services and the continuity of care. 1302.101(a)(3)
2. The recipient will explain how the budget development and approval process demonstrates that program goals and objectives are taken into account to set priorities and make trade-offs showing the program intentionally allocated resources to its highest priority goals and objectives. 1302.102(b)(1)(iii)
3. The recipient will describe how the governing body uses the fiscal information they receive to inform budget decisions. This includes:
  - a. How the governing body approves financial management, accounting, and reporting policies, and how the governing body ensures compliance with laws and regulations related to financial statements, including what the agency identified as major financial expenditures. 642(c)(1)(E)(iv)(VII)(aa)
  - b. The governing body's role in approval of the annual operating budget. 642(c)(1)(E)(iv)(VII)(bb)
4. The recipient will describe the policy council's engagement in the budget process, including:
  - a. The policy council's role in the budget process. 642(c)(2)(D)(iv)
5. The recipient will describe:
  - a. How the budget development process of the governing body and the policy council is supported by accurate and regular information, including information regarding program goals and objectives. 1302.102(d)(1)(i)
  - b. How the budget development process of the governing body and the policy council is supported by accurate and regular information, including financial statements and reports. 642(d)(2)(A-I)
  - c. How the governing body is trained to ensure members understand the information received and can effectively oversee budget decisions. 642(d)(3)

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*To address this performance measure, the recipient will demonstrate how its budget development and approval process reflects the awareness of fiscal staff, the governing body, and the policy council of the goals and objectives of the program. The recipient will also demonstrate that program objectives, progress, and experiences are taken into account in making budget decisions. Ultimately, the recipient's budget must support the program in delivering comprehensive, quality services to enrolled children and families.*

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## Ongoing Fiscal Capacity

**PM2: The recipient plans and implements a fiscal management system that supports the organization's ongoing capacity to execute its budget over time and meet the needs of its organization.**

1. The recipient will describe the fiscal complexity of the program (i.e., multiple funding sources, numerous and widespread locations, number of Head Start/Early Head Start grants, delegates, facilities) and applicable financial management requirements, then show the training, experience, and qualifications of the fiscal officer and fiscal staff are appropriate for the complexity of the program. 1302.91(c)
2. The recipient will describe the staffing and internal controls that support the program's financial management system. 75.303(a),(b),(e)
  - a. Does the recipient establish and maintain effective internal control over the federal award? 75.303(a)

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*The recipient's fiscal capacity includes having fiscal staff with the education, experience, and capacity to support the program, given the level of fiscal complexity of its grant(s) and applicable financial management requirements. Fiscal capacity also includes ongoing assessment of the program's funds and property, as well as identification, assessment, and response to identified risk assessment.*

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- b. Does the recipient have processes in place to ensure compliance with requirements, including Federal statutes, regulations, and terms and conditions of the Federal award? 75.303(b)
- c. Does the recipient take reasonable measures to safeguard protected personally identifiable information and other information the Health and Human Services awarding agency designates as sensitive? 75.303(e)
- 3. The recipient will describe the program’s ongoing process to identify, assess, and address risks, including how the agency responds to identified risks through systemic improvements; cost-effective insurance, such as natural disaster, child injury, and electronic theft; bonds; and other risk reduction measures. 1303.12
- 4. The recipient will describe the program’s process for ensuring that funds awarded to prevent, prepare for, and respond to COVID-19 (e.g., Coronavirus Aid, Relief, and Economic Security Act and Coronavirus Response and Relief Supplemental Appropriations Act) are used only for their appropriated purposes.

## Budget Execution

**PM3: The recipient’s financial management system provides for effective control over and accountability for all funds, property, and other assets.**

1. **Personnel Compensation and Fringe Benefits.** The recipient will demonstrate its ability to manage personnel compensation and fringe benefits.
  - a. Are wages comparable and do they meet the program’s needs for recruitment and retention of qualified staff? 653(a)
  - b. Does the recipient identify and account for indirect costs? 75.414
  - c. Does the recipient accurately track the time of non-exempt employees? 75.430(i)
  - d. Does the recipient maintain a written plan that ensures costs allocable to more than one funding source, including personnel costs, are shared across programs relative to the benefit received by each program? 75.405(a)
  - e. Does the recipient effectively manage its Head Start funds to ensure funds are used only for authorized purposes? 75.302(b)(4)
  - f. Are Head Start funds used only for expenses associated with authorized Head Start activities? 75.302(b)(3)
  - g. Are funds drawn down in relation to immediate cash needs and is the time between when funds are drawn down and payments are made minimized to ensure timely payment to vendors and contractors? 75.305(b)(1)
  - h. Is the recipient liable for any fines, late fees, or penalties related to its function as an employer (e.g., Internal Revenue Service, Department of Labor, workers compensation, unemployment insurance)? 75.441
  - i. Does the recipient evaluate and monitor personnel and other fiscal operations to ensure compliance with laws, rules, regulations, and terms of the award? 75.303(c)
  - j. Does the recipient have a process for taking prompt action to address any identified areas of noncompliance? 75.303(d)

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*The recipient will demonstrate its ability to manage major expenditures and accurately reconcile major accounts. The most significant expenses for Head Start recipients are personnel and associated mandatory and employer-sponsored benefits. The fiscal reviewer will use the recipient’s personnel expenditures as the basis for exploring how the recipient manages fiscal operations.*

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2. **Procurement.** The recipient will describe the program's system for determining whether individual expenses are necessary, reasonable, allocable, and adequately documented.
  - a. Does the recipient have a process for the purchasing and contracting of goods and services?  
75.302(b)(7)
  - b. Does the recipient ensure all purchases and contracts meet the criteria affecting allowability?  
75.403(a-g)
  - c. Does the recipient ensure there are an adequate number of qualified vendors to demonstrate required competition for micro-purchases (currently below \$10,000), small purchases (\$10,000 to \$249,999) [75.329(a-b)], and purchases over the simplified acquisition threshold (currently \$250,000)? 75.332
  - d. Does the recipient ensure it only makes purchases from, and contracts with, qualified vendors?  
75.327(h)
  - e. Does the recipient exclude related parties such as members of the governing body, staff, or family members as vendors, contractors, lessors, or lenders? 75.328(a)(4)(5)(7)
  - f. When the recipient approves purchases and contracted services, does it ensure free and open competition? 75.328(c-d)

## Facilities and Equipment

**PM4: The recipient complies with application, prior approval, and reporting requirements for facilities purchased, constructed, or renovated with Head Start funds.**

1. If Head Start funds have been used to make mortgage payments, fund renovations in excess of \$250,000 for a single facility, purchase a facility outright (e.g., land, building, modular unit), make a down payment, or construct a new facility, the recipient will describe:
  - a. How the recipient ensured it received prior Administration for Children and Families approval for use of funds. 75.308(c)(1)(xi)
  - b. How the recipient filed or posted a notice of federal interest that reflects the use of funds.  
1303.46(b)(1-4)
2. The recipient will demonstrate how the program maintains a complete inventory of all equipment purchased, in whole or in part, with Head Start funds. 75.320(d)(2)
3. The recipient will demonstrate how the program ensures the SF-429A is filed electronically (for all years after 2017), as well as the process for ensuring the accuracy of the SF-429A. 75.343

## ***Monitoring ERSEA: Eligibility, Recruitment, Selection, Enrollment, and Attendance***

### **Overview**

#### **Purpose**

This section focuses on how the recipient ensures compliance with ERSEA program requirements.

#### **Approach**

The recipient will provide child files to assist the reviewers in monitoring that eligible children and families are receiving Head Start services. The recipient will also demonstrate the program's process for ensuring the program remains fully enrolled.

#### **Outcomes**

The recipient will share information about ERSEA practices and how data is used to ensure the program maintains funded enrollment based on eligibility criteria.

### **Federal Regulations**

1302.12(c-e) and (k-m) Determining, verifying, and documenting eligibility

1302.14(b) Children eligible for services under IDEA

1302.15(a) Enrollment

### **What We Want to Learn**

#### **Determining, Verifying, and Documenting Eligibility**

A reviewer will assess a sample of files for enrolled children and expectant families to understand the program's eligibility determinations, including the supporting documentation used to verify eligibility.

**PM 1: The recipient enrolls children or expectant mothers who are categorically eligible or who meet defined income-eligibility requirements.**

1. The recipient will demonstrate how the program maintains files with an eligibility record that includes:
  - The child's or expectant mother's eligibility category,
  - Documentation that staff completed an in-person or phone interview with the family
  - The documents used to determine eligibility for each child or expectant mother and their authenticity.1302.12(k)
2. The recipient will demonstrate how the program determines the category of eligibility for children and expectant mothers, and how staff monitor and track slot availability. This includes information about which eligibility criteria the family meets and how the program ensures compliance with over-income criteria: 1302.12(c)(1-2), (d)(1), and (e)(1)(iii)

Eligibility requirements. An expectant mother or child is eligible if:

- Family income is equal to or below the poverty line

- Family or child is receiving or is eligible to receive public assistance (e.g., Supplemental Security Income and Temporary Assistance for Needy Families)
- Child/Expectant mother is experiencing homelessness
- Child is in foster care

Additional income-eligibility criteria include:

- A total of 10% of children enrolled in the program may be above the income threshold.
  - An additional 35% of children who are not categorically eligible may be from families whose income is between 100% and 130% of poverty.
3. The recipient will discuss and share the percentages of applicants' ineligible for Head Start services, including the following:
- Families who did not meet the categorical eligibility requirements, and the program enrolled as the 10% enrollment above the income threshold (a) above.
  - Families who the program enrolled as the additional 35% who were not categorically eligible but whose income was between 100% and 130% of poverty.
  - Families who the program did not enroll in the program at all.
    - i. The recipient will describe the program's approach to supporting ineligible families who were not enrolled in the program.

*Note: For tribal programs, there are additional allowances provided under 1302.12(e).*

4. The recipient will describe how the program ensures staff receive ERSEA training and comply with eligibility determination regulations, including having policies and procedures in place to describe actions taken against staff who violate these regulations. 1302.12(l-m)
5. The recipient will describe how the program ensures all documents verify family and expectant mother's income in addition to how the program verifies eligibility signed by staff. 1302.12(a)(ii)

**PM2: At least 10% of the recipient's total funded enrollment is filled by children eligible for services under the Individuals with Disabilities Education Act (IDEA) or the recipient has received a waiver.**

1. The recipient will demonstrate that at least 10% of the program's total funded enrollment is filled by children eligible for services under IDEA, or that the recipient has received a waiver. 1302.14(b)(1)

## Enrollment Verification

**PM 3: The recipient maintains and tracks full enrollment.**

1. The recipient will share the system for tracking and maintaining full enrollment.
2. The recipient will demonstrate the process for filling vacancies that are 30 days or longer. 1302.15(a)
3. The program will demonstrate their process for tracking interactions with expectant families, including the services expectant mothers and their families may receive from community partners.
4. The recipient will share the waitlist of eligible children that ranks children according to the program's selection criteria. 1302.14(c)
5. The recipient will provide data supporting enrollment and attendance numbers for the previous four months and demonstrate the accuracy of enrollment data submitted to the OHS.



# Head Start Program Governance

*Reference Book*



NATIONAL CENTER ON  
Program Management and Fiscal Operations

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# HEAD START ACT



## Governing Body Sec. 642 (c)(1)

(c) Program Governance – Upon receiving designation as a Head Start agency, the agency shall establish and maintain a formal structure for program governance, for the oversight of quality services for Head Start children and families and for making decisions related to program design and implementation. Such structure shall include the following:

### (1) GOVERNING BODY –

- (A) **In General** – The governing body shall have legal and fiscal responsibility for the Head Start agency.
- (B) **Composition** – The governing body shall be composed as follows:
  - (i) Not less than 1 member shall have a background and expertise in fiscal management or accounting.
  - (ii) Not less than 1 member shall have a background and expertise in early childhood education and development.





## Governing Body Sec. 642 (c)(1) *continued*

- (iii) Not less than 1 member shall be a licensed attorney familiar with issues that come before the governing body.
  - (iv) Additional members shall—
    - (I) reflect the community to be served and include parents of children who are currently, or were formerly, enrolled in Head Start programs; and
    - (II) are selected for their expertise in education, business administration, or community affairs.
  - (v) Exceptions shall be made to the requirements of clauses (i) through (iv) for members of a governing body when those members oversee a public entity and are selected to their positions with the public entity by public election or political appointment.
  - (vi) If a person described in clause (i), (ii), or (iii) is not available to serve as a member of the governing body, the governing body shall use a consultant, or another individual with relevant expertise, with the qualifications described in that clause, who shall work directly with the governing body.
- (C) **Conflict of Interest** – Members of the governing body shall:
- (i) not have a financial conflict of interest with the Head Start agency (including any delegate agency);
  - (ii) not receive compensation for serving on the governing body or for providing services to the Head Start agency;
  - (iii) not be employed, nor shall members of their immediate family be employed, by the Head Start agency (including any delegate agency); and
  - (iv) operate as an entity independent of staff employed by the Head Start agency.
- (D) **Exception** – If an individual holds a position as a result of public election or political appointment, and such position carries with it a concurrent appointment to serve as a member of a Head Start agency governing body, and such individual has any conflict of interest described in clause (ii) or (iii) of subparagraph (C)--



- (i) such individual shall not be prohibited from serving on such body and the Head Start agency shall report such conflict to the Secretary; and
- (ii) if the position held as a result of public election or political appointment provides compensation, such individual shall not be prohibited from receiving such compensation.

**(E) Responsibilities** – The governing body shall—

- (i) have legal and fiscal responsibility for administering and overseeing programs under this subchapter, including the safeguarding of federal funds;
- (ii) adopt practices that assure active, independent, and informed governance of the Head Start agency, including practices consistent with subsection (d)(1), and fully participate in the development, planning and evaluation of the Head Start programs involved;
- (iii) be responsible for ensuring compliance with Federal laws (including regulations) and applicable state, tribal and local laws (including regulations); and
- (iv) be responsible for other activities, including—
  - (I) selecting delegate agencies and the service areas for such agencies;
  - (II) establishing procedures and criteria for recruitment, selection, and enrollment of children;
  - (III) reviewing applications for funding and amendments to applications for funding for programs under this subchapter;
  - (IV) establishing procedures and guidelines for accessing and collecting information described in subsection (d)(2);
  - (V) reviewing and approving all major policies of the agency, including—
    - (aa) the annual self assessment and financial audit;



## Governing Body Sec. 642 (c)(1) *continued*

- (bb) such agency's progress in carrying out the programmatic and fiscal provisions in such agency's grant application, including implementation of corrective actions; and
  - (cc) personnel policies of such agencies regarding the hiring, evaluation, termination, and compensation of agency employees;
- (VI) developing procedures for how members of the policy council are selected, consistent with paragraph(2)(B);
- (VII) approving financial management, accounting, and reporting policies, and compliance with laws and regulations related to financial statements, including the –
- (aa) approval of all major financial expenditures of the agency;
  - (bb) annual approval of the operating budget;
  - (cc) selection (except when a financial auditor is assigned by the State under State law or is assigned under local law) of independent financial auditors who shall report all critical accounting policies and practices to the governing body; and
  - (dd) monitoring of the agency's actions to correct any audit findings and of other actions necessary to comply with applicable laws (including regulations) governing financial statements and accounting practices;
- (VIII) reviewing results from monitoring conducted under section 641A(c) including appropriate follow-up activities;



- (IX) approving personnel policies and procedures, including policies and procedures regarding the hiring, evaluation and compensation, and termination of the Executive Director, Head Start Director, Director of Human Resources, Chief Fiscal Officer, and any other person in an equivalent position with the agency;
- (X) establishing, adopting, and periodically updating written standards of conduct that establish standards and formal procedures for disclosing, addressing, and resolving—
  - (aa) any conflict of interest, and any appearance of conflict of interest, by members of the governing body, officers and employees of the Head Start agency, and consultants and agents who provide services or furnish goods to the Head Start agency; and
  - (bb) complaints, including investigations, when appropriate; and
- (XI) to the extent practicable and appropriate at the discretions of the governing body, establishing advisory committees to oversee key responsibilities related to program governance and improvement of the Head Start program involved.



- (A) **In General** – Consistent with paragraph (1)(E), each Head Start agency shall have a policy council responsible for the direction of the Head Start program, including program design and operation, and long- and short-term planning goals and objectives, taking into account the annual communitywide strategic planning and needs assessment and self-assessment.
- (B) **Composition and Selection** –
- (i) The policy council shall be elected by the parents of children who are currently enrolled in the Head Start program of the Head Start agency.
  - (ii) The policy council shall be composed of –
    - (i) parents of children who are currently enrolled in the Head Start program of the Head Start agency (including any delegate agency), who shall constitute a majority of the members of the policy council; and
    - (ii) members at large of the community served by the Head Start agency (including any delegate agency), who may include parents of children who were formerly enrolled in the Head Start program of the agency.
- (C) **Conflict of Interest** – Members of the policy council shall –
- (i) not have a conflict of interest with the Head Start agency (including any delegate agency); and
  - (ii) not receive compensation for serving on the policy council or for providing services to the Head Start agency.
- (D) **Responsibilities** – The policy council shall approve and submit to the governing body decisions about each of the following activities:
- (i) Activities to support the active involvement of parents in supporting program operations, including policies to ensure that the Head Start agency is responsive to community and parent needs.
  - (ii) Program recruitment, selection, and enrollment priorities



## Policy Council Sec. 642 (c)(2) *continued*

- (iii) Applications for funding and amendments to applications for funding for programs under this subchapter, prior to submission of applications described in this clause.
- (iv) Budget planning for program expenditures, including policies for reimbursement and participation in policy council activities.
- (v) Bylaws for the operation of the policy council.
- (vi) Program personnel policies and decisions regarding the employment of program staff, consistent with paragraph (1)(E)(iv)(IX), including standards of conduct for program staff, contractors, and volunteers and criteria for the employment and dismissal of program staff.
- (vii) Developing procedures for how members of the policy council of the Head Start agency will be elected.
- (viii) Recommendations on the selection of delegate agencies and the service areas for such agencies.



## Policy Committees Sec. 642 (c)(3)

- (3) Policy Committees** – Each delegate agency shall create a policy committee, which shall --
- (A) be elected and composed of members, consistent with paragraph (2)(B) (with respect to delegate agencies);
  - (B) follow procedures to prohibit conflict of interest, consistent with clauses (i) and (ii) of paragraph (2)(C) (with respect to delegate agencies); and
  - (C) be responsible for approval and submission of decisions about activities as they relate to the delegate agency, consistent with paragraph (2)(D) (with respect to delegate agencies).



(1) **Impasse Policies** – The Secretary shall develop policies, procedures, and guidance for Head Start agencies concerning

- (A) the resolution of internal disputes, including any impasse in the governance of Head Start programs; and
- (B) the facilitation of meaningful consultation and collaboration about decisions of the governing body and policy council.

(2) **Conduct of Responsibilities** – Each Head Start agency shall ensure the sharing of accurate and regular information for use by the governing body and policy council, about program planning, policies, and Head Start agency operations, including:

- (A) Monthly financial statements, including credit card expenditures;
- (B) Monthly program information summaries;
- (C) Program enrollment reports, including attendance reports for children whose care is partially subsidized by another public agency;
- (D) Monthly reports of meals and snacks provided through programs of the Department of Agriculture;
- (E) the financial audit;
- (F) the annual self-assessment, including any findings related to such assessment;
- (G) the communitywide strategic planning and needs assessment of the Head Start agency, including any applicable updates;
- (H) communication and guidance from the Secretary; and
- (I) the program information reports.

(3) **Training and Technical Assistance** – Appropriate training and technical assistance shall be provided to the members of the governing body and the policy council to ensure that the members understand the information the members receive and can effectively oversee and participate in the programs of the Head Start agency.



# HEAD START PROGRAM PERFORMANCE STANDARDS



## 45 CFR §1301.1 Purpose.

An agency, as defined in part 1305 of this chapter, must establish and maintain a formal structure for program governance that includes a governing body, a policy council at the agency level and policy committee at the delegate level, and a parent committee. Governing bodies have a legal and fiscal responsibility to administer and oversee the agency’s Head Start and Early Head Start programs. Policy councils are responsible for the direction of the agency’s Head Start and Early Head Start programs.





## 45 CFR §1301.2 Governing body.

- (a) **Composition.** The composition of a governing body must be in accordance with the requirements specified at section 642(c)(1)(B) of the Act, except where specific exceptions are authorized in the case of public entities at section 642(c)(1)(D) of the Act. Agencies must ensure members of the governing body do not have a conflict of interest, pursuant to section 642(c)(1)(C) of the Act.
- (b) **Duties and responsibilities.**
  - (1) The governing body is responsible for activities specified at section 642(c)(1)(E) of the Act.
  - (2) The governing body must use ongoing monitoring results, data on school readiness goals, other information described in §1302.102, and information described at section 642(d)(2) of the Act to conduct its responsibilities.
- (c) **Advisory committees.**
  - (1) A governing body may establish advisory committees as it deems necessary for effective governance and improvement of the program.
  - (2) If a governing body establishes an advisory committee to oversee key responsibilities related to program governance, it must:
    - (i) Establish the structure, communication, and oversight in such a way that the governing body continues to maintain its legal and fiscal responsibility for the Head Start agency; and,
    - (ii) Notify the responsible HHS official of its intent to establish such an advisory committee.



## 45 CFR §1301.3 Policy council and policy committee.

- (a) **Establishing policy councils and policy committees.** Each agency must establish and maintain a policy council responsible for the direction of the Head Start program at the agency level, and a policy committee at the delegate level. If an agency delegates operational responsibility for the entire Head Start or Early Head Start program to one delegate agency, the policy council and policy committee may be the same body.
- (b) **Composition.**
- (1) A program must establish a policy council in accordance with section 642(c)(2)(B) of the Act, or a policy committee at the delegate level in accordance with section 642(c)(3) of the Act, as early in the program year as possible. Parents of children currently enrolled in each program option must be proportionately represented on the policy council and on the policy committee at the delegate level.
  - (2) The program must ensure members of the policy council, and of the policy committee at the delegate level, do not have a conflict of interest pursuant to sections 642(c)(2)(C) and 642(c)(3)(B) of the Act. Staff may not serve on the policy council or policy committee at the delegate level except parents who occasionally substitute as staff. In the case of tribal grantees, this exclusion applies only to tribal staff who work in areas directly related to or which directly impact administrative, fiscal, or programmatic issues.
- (c) **Duties and responsibilities.**
- (1) A policy council is responsible for activities specified at section 642(c)(2)(D) of the Act. A policy committee must approve and submit to the delegate agency its decisions in each of the following areas referenced at section 642(c)(2)(D)(i) through (vii) of the Act.



## 45 CFR §1301.3 Policy council and policy committee. *continued*

- (2) A policy council, and a policy committee at the delegate level, must use ongoing monitoring results, data on school readiness goals, other information described in §1302.102, and information described in section 642(d)(2) of the Act to conduct its responsibilities.
- (d) **Term.**
- (1) A member will serve for one year.
  - (2) If the member intends to serve for another year, s/he must stand for re-election.
  - (3) The policy council, and policy committee at the delegate level, must include in its bylaws how many one-year terms, not to exceed five terms, a person may serve.
  - (4) A program must seat a successor policy council, or policy committee at the delegate level, before an existing policy council, or policy committee at the delegate level, may be dissolved.
- (e) **Reimbursement.** A program must enable low-income members to participate fully in their policy council or policy committee responsibilities by providing, if necessary, reimbursements for reasonable expenses incurred by the low-income members.



## 45 CFR §1301.4 Parent committees.

- (a) **Establishing parent committees.** A program must establish a parent committee comprised exclusively of parents of currently enrolled children as early in the program year as possible. This committee must be established at the center level for center-based programs and at the local program level for other program options. When a program operates more than one option, parents may choose to have a separate committee for each option or combine membership. A program must ensure that parents of currently enrolled children understand the process for elections to the policy council or policy committee and other leadership opportunities.
- (b) **Requirements of parent committees.** Within the parent committee structure, a program may determine the best methods to engage families using strategies that are most effective in their community, as long as the program ensures the parent committee carries out the following minimum responsibilities:
- (1) Advise staff in developing and implementing local program policies, activities, and services to ensure they meet the needs of children and families;
  - (2) Have a process for communication with the policy council and policy committee; and
  - (3) Within the guidelines established by the governing body, policy council or policy committee, participate in the recruitment and screening of Early Head Start and Head Start employees.



## 45 CFR §1301.5 Training.

An agency must provide appropriate training and technical assistance or orientation to the governing body, any advisory committee members, and the policy council, including training on program performance standards and training indicated in §1302.12(m) to ensure the members understand the information they receive and can effectively oversee and participate in the programs in the Head Start agency.



## 45 CFR §1301.6 Impasse procedures.

- (a) To facilitate meaningful consultation and collaboration about decisions of the governing body and the policy council, each agency's governing body and policy council jointly must establish written procedures for resolving internal disputes between the governing board and policy council in a timely manner that include impasse procedures. These procedures must:
- (1) Demonstrate that the governing body considers proposed decisions from the policy council and that the policy council considers proposed decisions from the governing body;
  - (2) If there is a disagreement, require the governing body and the policy council to notify the other in writing why it does not accept a decision; and,
  - (3) Describe a decision-making process and a timeline to resolve disputes and reach decisions that are not arbitrary, capricious, or illegal.
- (b) If the agency's decision-making process does not result in a resolution and an impasse continues, the governing body and policy council must select a mutually agreeable third party mediator and participate in a formal process of mediation that leads to a resolution of the dispute.
- (c) For all programs except American Indian and Alaska Native programs, if no resolution is reached with a mediator, the governing body and policy council must select a mutually agreeable arbitrator whose decision is final.

HEAD START PERFORMANCE STANDARDS  
PART 1301 PROGRAM GOVERNANCE

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ALPI HEAD START/EARLY HEAD START  
OPERATIONAL POLICIES AND PROCEDURES  
**PART 1 – PROGRAM GOVERNANCE**

SUBJECT	<b>Program Governance</b>
45 CFR SECTION:	1301.1-2
PERFORMANCE OBJECTIVE:	To establish and maintain a formal structure for program governance for the oversight of quality services for Head Start children and families and for making decisions related to program design and implementation.

**§1301.1 PURPOSE**

To establish and maintain a formal structure for program governance that includes a governing body, a policy council at the agency level and a parent committee at the center-based level; which responsibilities will consist of the governing body being responsible for the legal and fiscal responsibility to administer and oversee the agency’s Head Start and Early Head Start program and the policy council is responsible for the direction of the Head Start and Early Head Start program.

ALPI formal structure of program governance consists of:

- Board of Directors (governing body), legally and fiscally responsible for the Head Start/Early Head Start program which composition includes at least one member with background and expertise in fiscal management or accounting; one member with background and expertise in early childhood education and development; and one member as a licensed attorney familiar with issues that may come before the governing body.
  
- Policy Council, responsible for the direction of the Head Start/Early Head Start program, including the design and operations; which composition consists of parents of children who are currently enrolled in the Head Start/Early Head Start program as the majority of the members of the policy council; and members at large of the community served by the program who may include parents of children who were formerly enrolled in the program.
  
- Parent committees, each Head Start or Early Head Start directly operated or contracted center will establish at the center-based level a parent committee comprised exclusively of parents of currently enrolled children as early in the program year as possible (September of each year); which will be responsible for advising staff on program policies, activities, recruitment, etc.

ALPI HEAD START/EARLY HEAD START  
OPERATIONAL POLICIES AND PROCEDURES  
**PART 1 – PROGRAM GOVERNANCE**

<b>SUBJECT</b>	<b>Program Governance</b>
<b>45 CFR SECTION:</b>	§1301.2 Governing Body
<b>PERFORMANCE OBJECTIVE:</b>	To establish and maintain a formal structure for program governance for the oversight of quality services for Head Start children and families and for making decisions related to program design and implementation.

**POLICIES**

a) Composition – ALPI’s Board of Director’s (governing body) composition is in accordance with the requirements specified in the Head Start Act §642(C)(1)(B); which include one member with a background and expertise in fiscal management or accounting, one member with a background and expertise in early childhood education and development, one member a licensed attorney, and one parent (policy council representative) of children who are currently enrolled in the program. In the event that the Board of Directors is unable to secure a member with such background and expertise, the Board will use a consultant or an individual with relevant expertise with the qualifications described in the Head Start Act §642.

b) Duties and Responsibilities –

(1) ALPI’s Board of Directors responsibilities include but are not limited to the following:

- Having legal and fiscal responsibility for administering and overseeing programs including Head Start and Early Head Start, and the safeguarding of Federal funds;
- Adopting practices that assure active, independent, and informed governance of the Head Start agency, including practices consistent with subsection (d)(1), and fully participate in the development, planning, and evaluation of the Head Start programs involved;
- Ensuring compliance with Federal laws (including regulations) and applicable State, and local laws (including regulations) including:
  - Selecting delegate agencies and the service areas for such agencies;
  - Establishing procedures and criteria for recruitment, selection, and enrollment of children;
  - Reviewing all applications for funding and amendments to applications for funding of the program;
  - Establishing procedures and guidelines for accessing and collecting information described in subsection (d)(2) of the Head Start Act;
- Reviewing and approving all major policies including:
  - The annual self-assessment and financial audit;

- Progress in carrying out the programmatic and fiscal provisions in the grant applications including implementation of corrective actions; and
- Personnel policies regarding the hiring, evaluation, termination, and compensation of agency employees;
- Developing procedures for how members of the policy council composition and selection;
- Approving financial management, accounting, and reporting policies, and compliance with laws and regulations related to financial statements, including the following:
  - Approval of all major financial expenditures of the agency;
  - Annual approval of the operating budget of the agency;
  - Selection (except when a financial auditor is assigned by the State under State law or is assigned under local law) of independent financial auditors who shall report all critical accounting policies and practices to the governing body; and
  - Monitoring of the agency's actions to correct any audit findings and of other action necessary to comply with applicable laws (including regulations) governing financial statement and accounting practices;
- Reviewing results from monitoring conducted under section 641A(c), including appropriate follow-up activities;
- Approving personnel policies and procedures, including policies and procedures regarding the hiring, evaluation, compensation, and termination of the Executive Director, Head Start Director, Director of Human Resources, Chief Fiscal Officer, and any other person in an equivalent position with the agency;
- Establishing, adopting, and periodically updating written standards of conduct that establish standards and formal procedures for disclosing, addressing, and resolving including:
  - Any conflict of interest, and any appearance of a conflict of interest, by members of the governing body, officers and employees of the agency, and consultants and agents who provide services or furnish goods to the agency; and
  - Complaints, including investigations, when appropriate.

(2) The Board of Directors (governing body) uses ongoing monitoring results, data on school readiness goals, other information described in §1302.102, and information described in section 642(d)(2) of the Head Start Act to conduct its responsibilities, to include but are not limited to:

- Financial statements including credit card expenditures
- Program progress summaries reports
- Program enrollment and attendance reports including children partially enrolled in subsidize care
- Meals and snacks provided through the Child Care Food Program/USDA
- Financial audit

- Program annual self-assessment report and improvement plan
- Agency's communitywide strategic planning, and needs assessment of the program including annual updates
- Communication and guidance from the funders
- The annual Program Information Report (PIR)
- Agency's progress in carrying out the programmatic and fiscal provisions in such agency's grant application, including implementation of corrective actions; and
- Personnel policies of such agencies regarding the hiring, evaluation, termination, and compensation of agency employees;

c) Advisory Committees:

(1) The Board of Directors (governing body) may establish advisory committees as it deems necessary for effective governance and improvement of the program.

(2) If the Board of Directors (governing body) establishes an advisory committee to oversee key responsibilities related to program governance, it must:

- Establish the structure, communication, and oversight in such a way that the Board of Directors (governing body) continues to maintain its legal and fiscal responsibility for the agency;
- Notify the responsible HHS official of its intent to establish such advisory.

**OPERATIONAL PROCEDURE:**

1. ALPI's Board of Directors will be composed to include: one member with a background and expertise in fiscal management or accounting, one member with a background and expertise in early childhood education and development, and one member a licensed attorney. In the event that the Board of Directors is unable to secure a member with such background and expertise, the Board shall use a consultant or an individual with relevant expertise with the qualifications described in the Head Start Act Section 642 (c).
2. It is the responsibility of the Chief Executive Officer to ensure that the ALPI Board of Directors is functioning at all times within the federal regulations, state, and local applicable laws including, but not limited to the following:
  - Preparing for and providing annual orientation sessions for the ALPI Board of Directors members;
  - Securing and distributing resource information to enhance individual skills and clarity of roles and responsibilities;
  - Providing for the distribution of program and financial management reports;
  - Facilitate the joint training of the ALPI Board of Directors and Policy Council in strategic planning, financial management, resource development, etc.;
  - Facilitate the approval to include but are not limited to the following:

- Fiscal Management Policies and Procedures
  - Personnel Policies & Procedures to include;
    - i. The hiring, evaluation, compensation and termination of the Chief Executive Officer, Head Start/Early Head Start Director, Human Resources Director, Budget and Finance Director, and any person in an equivalent position with the agency
  - Grant applications and amendments
  - Criteria for recruitment, selection, and enrollment of children
  - Program Information Report (PIR)
  - Annual operating budget and major expenditures
  - Compliant procedure to include investigation, when is appropriate
3. It is the responsibility of the Chief Executive Officer to ensure that ALPI Board of Directors receive appropriate orientation, training and technical assistance and to inform them of management procedures & functions necessary to implement a high quality program through orientation, trainings, conferences, and meetings. The orientation/training will include but are not limited to:
- Composition of the Board of Directors
  - Responsibilities
  - Conflict of Interest
  - Impasse Procedures
  - Advisory Councils
  - ERSEA
  - Ongoing Monitoring
  - School Readiness Data
4. It is the responsibility of the Chief Executive Officer to provide information to the ALPI Board of Directors on a monthly, bi-monthly, and annual basis. This information will include, but are not limited to the following:
- Financial Reports
  - Program growth, improvement, development, etc.
  - Self-Assessment/Audits
  - Federal Reviews
  - Funding applications and amendments
  - Criteria for recruitment, selection, and enrollment of children
  - Program enrollment and attendance to including VPK children
  - Program USDA monthly reports (meals and snacks)
5. It is the responsibility of the Chief Executive Officer, under the directives of the Board of Directors to submit a written request for approval to the Department of Health and Human

Services prior to making changes in the program or budget related that impacts Head Start/Early Head Start. These changes include, but are not limited to the following:

- Scope of program (Head Start/Early Head Start) Services
  - Change in key personnel including Executive Officer, Program Operations Director, Fiscal Officer, Human Resources and other person in an equivalent position.
6. It is the responsibility of the Deputy Director and the Program Operations Directors to ensure that information about the program is submitted to the Board of Directors through the Chief Executive Officer and to Policy Council on a monthly basis.
  7. As per the Board of Directors bylaws, the corporation membership is divided into four (4) regions: southern, eastern, central, and northern, with each region having a Regional Advisory Council. The regions are designated by the Board of Directors.
  8. The regional advisory council serve in an advisory capacity to the Board of Directors and they are responsible to advise, and assist with community advocacy efforts and general promotion of the agency to support the organization's mission and needs.

*Refer to ALPI Board of Directors Bylaws for detailed information.*

**ALPI HEAD START/EARLY HEAD START  
OPERATIONAL POLICIES AND PROCEDURES  
PART 1 – PROGRAM GOVERNANCE**

<b>SUBJECT</b>	<b>Program Governance</b>
<b>45 CFR SECTION:</b>	§1301.3 Policy Council
<b>PERFORMANCE OBJECTIVE:</b>	To establish and maintain a formal structure of shared governance through which parents can participate in policy-making and the decision-making for the direction of the Head Start and Early Head Start programs.

**POLICIES**

a) ALPI establish and maintain a Policy Council at the agency level and is responsible for the direction of the Head Start and Early Head Start program, including program design and operations, long/short-term planning goals and objectives, taking into account the annual communitywide strategic planning, needs assessment and self-assessment.

b) Composition – ALPI’s Policy Council composition consist of parents of children who are currently enrolled in the Head Start and Early Head Start program, which constitute of the majority (74%) of the members of the policy council; and members at large of the community served by the program who may include parents of children who were formerly enrolled in the program and one Board of Directors (governing body) representative.

ALPI establish and maintain a process that ensures that members of the policy council do not have a conflict of interest in accordance with Head Start Act. No staff or members of their immediate families will serve on the policy council except parents who occasionally substitute as staff.

c) Duties and Responsibilities –

(1) ALPI’s Policy Council is responsible for activities specified §642(c)(2)(D) of the Head Start Act; which activities shall approve and submit to the Board of Directors (governing body) decisions to include the following:

- Activities that support the active involvement of parents in supporting program operations, including policies to ensure that the program is responsive to the community and parent’s needs;
- Program recruitment, selection, and enrollment priorities;
- Applications for funding and amendments to applications for funding for programs prior to submission of the applications;

- Budget planning for program expenditures, including policies for reimbursement and participation in policy council activities;
- Bylaws for the operation of the policy council;
- Program personnel policies and decisions regarding the employment of program staff, consistent with the Head Start Act §642(1)(E)(iv)(IX), including but are not limited to the following:
  - Personnel policies and procedures, including policies and procedures regarding the hiring, evaluation, compensation, and termination of the Executive Director, Head Start Director, Director of Human Resources, Chief Fiscal Officer, and any other person in an equivalent position with the agency;
  - Personnel policies regarding the hiring, evaluation, termination, and compensation of employees.
- Developing procedures for how members of the policy council will be elected
- Recommendations on the selection of delegate agencies and the service areas of such agencies.

(2) The Policy Council uses ongoing monitoring results, data on school readiness goals, other information described in §1302.102, and information described in section (642(d)(2) of the Head Start Act to conduct its responsibilities to include but are not limited to:

- Financial statements including credit card expenditures
- Program progress summaries reports
- Program enrollment and attendance reports including children partially enrolled in subsidize care
- Meals and snacks provided through the Child Care Food Program/USDA
- Financial audit
- Program annual self-assessment report and improvement plan
- Agency's communitywide strategic planning, and needs assessment of the program including annual updates
- Communication and guidance from the funders
- The annual Program Information Report (PIR).

#### d) Term

- (1) A member will serve for one-year term
- (2) If the member intends to serve for another year, she or he will stand for re-election

(3) The Policy Council at the agency level in its bylaws will include how many one-year terms, not to exceed five terms, a person may serve

(4) The program seats the successor policy council, before the existing policy council is dissolved (October).

e) Reimbursement

The program will reimburse low-income parents participating in the policy council for reasonable expenses incurred if necessary.

**OPERATIONAL PROCEDURE:**

**Composition**

1. ALPI Board of Directors is responsible for the total membership of the Policy Council. The recommendations for composition are based on the number of Head Start and Early Head Start centers and children enrolled in the program. The centers with 5 or more classrooms elect two representatives and two alternates. Refer to the approved membership matrix per center in item #6 of this procedure.
2. The Program Operations Director is responsible for submitting a potential list of members at large of the community served to the Deputy Director and subsequently to the Chief Executive Officer for review and approval and to the Board of Directors.
3. Family Service staff will provide information to parents upon the recruitment and enrollment process about program opportunities; i.e., parent committees, Policy Council, advisory committees, etc.
4. The Child Development Services Manager/Coordinator and Contracted Center Directors are responsible for establishing and maintaining the Parent Committees at the center level and it's structure in September of the program year, and provide training to include but are not limited to the following:
  - Parliamentary Procedures
  - Roles and Responsibilities of Parents
  - Parent's Rights
  - Program Governance
  - Education and Child Development Program Services
  - Health Program Services
  - Family and Community Engagement Program Services

5. The Child Development Services Manager/Coordinator and Contracted Center Directors during the first Parent Committee Meeting in September with the assistance of the Family Support Services Coordinators and/or the Family and Community Partnerships Managers are responsible for facilitating the election process that will consist of the following officers:
  - President
  - Vice-president
  - Secretary
  - Treasurer
  - Policy Council Representative(s)
  - Policy Council Alternate(s)
  
6. The Child Development Services Managers will ensure that the established parent committee elects policy council representative(s) and alternate(s) at the first parent committee meeting in September, the membership per center will consist of the following:

**Directly operated centers:**

2 Classrooms Francina Duval HS Center	1 Representative & 1 Alternate
6 Classrooms Lincoln Park HS Center	2 Representatives & 2 alternates
5 Classrooms Garden Terrace HS Center	2 Representatives & 2 Alternates
9 Classrooms George W. Truitt FS Center	2 Representatives & 2 Alternates
9 Classrooms Child Dev. & FS Center	2 Representatives & 2 Alternates
6 Classrooms Frostproof Child Dev. Center	2 Representatives & 2 Alternates
14 Classrooms Queen Townsend HS Center II	2 Representatives & 2 Alternates

**Contracted centers:**

Learning Tree Academy will work together with the Child Development Services Manager/Coordinator (liaison) from Francina Duval Head Start Center to elect 1 representative and 1 alternate.

JumpStart Development Center will work together with the Child Development Services Manager/Coordinator (liaison) from the Frostproof Child Development Center for the JumpStart parents to be represented by the elected members at the Frostproof Child Development Center.

7. Within 72 hours of the conclusion of the first Parent Committee Meeting, the Child Development Services Manager/Coordinator and Contracted Center Directors through the liaison will submit: name, address, home/work telephone numbers of the members elected to serve on the Policy Council to the Program Operations Directors.

8. Along with the information will be the signed certification of each elected members stating that he/she is not an ALPI or contracted centers staff member, nor member of their families, serving on the Policy Council. Immediate family means: wife, husband, son, daughter, mother, father, sister, brother, aunt, uncle, grand parents or relatives by marriage.
9. Policy Council members are elected or re-elected annually. (Community Representatives are selected annually). Policy Council will serve a one (1) year term beginning in October. Members may serve on the Policy Council shall not exceed a combined total of five (5) years. Any part of the year served will be considered as a full term.
10. Members that obtained employment with ALPI or contracted center, will be required to resign from the Policy Council; except parents who occasionally substitute for Head Start or Early Head Start Staff.
11. Past employees must be out of services for at least two years before becoming eligible to serve on the Policy Council.
12. The Program Operations Director or designee will develop a Policy Council Roster and forward it to the Deputy Director and the Chief Executive Officer within 72 hours after receiving the necessary information from the centers.

## **Orientation**

1. The Deputy Director and the Program Operations Directors will provide Orientation/Training to the Policy Council, and Board of Directors in October on various topics to include, but not limited to the following:
  - Composition of the Board of Directors
  - Responsibilities of the Board of Directors
  - Responsibilities of the Policy Council
  - Responsibilities and Rights of Parents
  - ERSEA
  - Funding Sources
  - Program Structure and Program Option
  - Delivery of Services
  
2. During the first Policy Council Meeting in October, the Deputy Director and Program Operations Directors are responsible for formally organizing the Policy Council. At this meeting, and prior to facilitating the election process, the Directors will submit the list of potential Community Representative Candidates approved by the Chief Executive Officer and the Board of Directors to the Policy Council for approval. After obtaining the approval of the Community Representatives, the Deputy Director and the Program Operations Directors or consultant will facilitate the election process by which, all positions are declared open and new officers are elected. These officers are:
  - Chairperson
  - Vice-chairperson
  - Secretary
  - Treasurer
  - Board of Directors Representative
  - Parliamentarian (if applicable)
  
3. Additional training is provided to Parents and Policy Council through monthly meetings, workshops, conferences, etc.
  
4. The Program Operations Directors are responsible for submitting the names of the elected officers to the Deputy Director and the Chief Executive Officer within 72 hours of the election.
  
5. The Deputy Director and the Program Operations Directors are responsible for submitting information for approval to the Policy Council, to include but are not limited to:
  - Fiscal Management Policies and Procedures
  - Personnel Policies and Procedures
  - Management Work Plans and Operational Policies & Procedures

- Policy Council Bylaws
  - Internal Dispute Resolution Procedure (Impasse Procedure)
  - Community/Parent Complaint Procedure
  - ERSEA Policies and Procedures
  - Criteria for recruitment, selection, and enrollment of children
  - Community Assessment Results
6. The Deputy Director and Program Operations Directors will work with the Policy Council to develop/review/update policies and procedures for implementing services and reporting according with federal, state and local requirements.
  7. Under the direction of the Deputy Director and Program Operations Director the Management staff has the overall responsibility for implementing and planning process and assuring involvement of appropriate staff, policy council, parents, and others.
  8. The Policy Council will meet in the monthly basis for least nine months of the program year and in accordance with the Bylaws. The meeting notice will be mailed seven days prior to the meeting along with a package of information for prior review by the members.
  9. The Deputy Director and the Program Operations Directors are responsible for providing information to the Policy Council on a monthly basis or as needed for review and approval; this information will include but is not limited to the following:
    - Financial statements, including credit cards expenditures
    - Program progress summaries
    - Program enrollment, including attendance reports for children whose care is partially subsidized by another public agency (VPK/School Readiness)
    - Meal and snacks/Child Care Food Program
    - Human Resource/Personnel Related issues
    - School Readiness Reports
    - CLASS Observation Reports
    - Financial audits when applicable
    - Annual self-assessment, including improvement plans
    - Communitywide strategic planning and needs assessment and updates
    - Communication and guidance from funders i.e., federal, state and local authorities
    - Program Information Report (PIR)
    - Community complaints
    - Program Changes
    - Funding applications and amendments applications
    - Parent Committee Reports

10. The Deputy Director is responsible for communicating with the policy council as needed utilizing various methods to include but not limited to the following:
  - Monthly meeting packages
  - Telephone calls & faxes
  - Meetings
  - Letters & Memorandums
  - Emails, etc.
11. The Deputy Director is responsible for ensuring that as part of the communication system, one Policy Council member seats in the Board of Directors memberships and one Board of Directors member seats in the policy council Memberships.
12. The Deputy Director, Program Operations Directors and selected Management Staff will work with the policy council to set long/short term program goals and objectives annually and/or during the developing of the refunding applications period by utilizing the following information:
  - Data and recommendations from the community assessment, program self-assessment, federal reviews, and recommendations from the Regional Office Staff, Board of Directors Strategic Plans, Program Information Report (PIR)
  - Child Outcomes/School Readiness Data/Reports
  - CLASS Observations Reports
  - Federal, State and local requirements and updates and other significant data.
13. The Deputy Director and the Program Operations Directors are responsible for facilitating the Program Annual Self-Assessment along with the Policy Council, Board of Directors, Management staff annually (February) of the Head Start and Early Head Start program of its operations and compliance with Performance Standards, Head Start Act, and other federal regulations and requirements. The annual self-assessment consist of the following:
  - The team will carry out the Self-Assessment of each program service area, in accordance with prescribed instruments (Office of Head Start Monitoring Protocol). The Board of Directors and Policy Council will approve/disapprove the Self-Assessment planning process.
  - The Program Operations Director or designee will provide training for team members on how to conduct the assessment, including visits to centers, review of records and systems; compilation of data, and writing of final reports that include strengths, weaknesses, findings, recommendations and plans for improvements. The review of records will include, but are not limited to the following:
    - Monitoring Reports

- School Readiness
  - Delivery of Service Reports Management Systems.
  - Staff Credentials/Professional Development Activities and Plan
  - Community Assessment Report/information
  - Children Cum Files
  - Financial Reports
  - Program Information Report (PIR)
- The Management Staff will utilize the results and recommendations from the Self-Assessment in planning for program improvements such as enhanced staff training, mentoring and supervision; improvements in curriculum; reallocation of program resources; involvement of parents and volunteers and community partners; or new efforts to support families in enhancing children’s learning and development.
  - The Management staff will submit the annual Self-Assessment Report and Improvement Plan to the Policy Council and Board for review and approval in March/April of the program year.

**Program Recruitment, selection and enrollment priorities**

1. The Deputy Director and the Program Operations Directors are responsible for submitting and training the Policy Council on §1302.12 of the Performance Standards in the month of October of the school year.
2. The Deputy Director and the Program Operations Directors are responsible for securing consultant if necessary to facilitate the training during the Policy Council orientation or as needed.
3. The Family Services Management Staff are responsible for development and updates of the policies and procedures for the program recruitment, selection, and enrollment priorities annually.
4. The Deputy Director and the Program Operations Directors are responsible to submit the policies and procedures for the program recruitment, selection, and enrollment priorities the Policy Council for approval and to the Chief Executive Officer for the Board of Directors approval.

## **Funding Application and Amendment Applications**

1. The Deputy Director and the Program Operations Directors will work with the policy council in the development of funding applications for the Head Start and Early Head Start program being in February of each year.
2. The Management staff under the direction of the directors will assist in the development and update of the funding application narrative to report on progress in meeting the goals and objectives of the program.
3. Once the funding application is completed, the Deputy Director and the Program Operations Directors are responsible for submitting the application for the Policy Council for approval and to the Chief Executive Officer for the Board of Directors approval.
4. Funding Notice of Awards will be submitted to the Policy Council and to the Board of Directors.

## **Bylaws**

1. The Deputy Director and the Program Operations Directors are responsible for submitting the currently Policy Council Bylaws to the newest elected Policy Council for review and approval in November/February of the school year.
2. The Chief Executive Officer is responsible for submitting the currently Board of Directors Bylaws to the Board of Directors in November/February of the fiscal year.
3. Once the Bylaws are reviewed and recommendations for revision and/or updates are made; the Board of Directors Bylaws Committee will responsible for coordinating the revisions and/or updates and later submitted to the Board of Directors for approval of the both set of Bylaws.
4. Prior to submit the revised Policy Council Bylaws to the Board of Directors; the Deputy Director and the Program Operations Directors are responsible for submission to the Policy Council for approval.
5. The Policy Council and Board of Directors Bylaws are review and updated annually and as needed.

## **Budget Planning for Program Expenditures**

1. The Deputy Director and the Program Operations Directors are responsible for ensure involvement of the Policy Council in the budget development process to include reimbursement for the participation of low-income families in program activities.
2. The Deputy Director and the Program Operations Directors responsible for provide opportunities for workshops, training, conference, etc. to policy council to promote skills enhancement, family and community engagement activities which will be a part of budget planning expenditures.
3. The Deputy Director and the Program Operations Directors are responsible to ensure that reimbursement for participation in the program activities are in accordance with the ALPI's Fiscal Management Policies and Procedures.
4. As part of the Policy Council major timelines and activities; Deputy Director and the Program Operations Directors will prepare and distribute established timelines for annually Board of Directors and Policy Council joint activities, conference, etc.
5. The Chief Executive Officer is responsible for submitting to the Board of Directors the Policy Council major timelines in February of the fiscal year.

## **Activities Supporting Parent Involvement**

1. The Deputy Director, Program Operations Directors and Management staff will provide opportunities to parents that support their involvement in the program operations and facilitate community support for parents; these will include but are not limited to:
  - Parent meetings
  - Parent Trainings
  - Policy Council
  - Advisory Councils
  - Reading Day with Dad/Mom
  - Community Drives
  - Community Workshops
2. The Management Staff is responsible for informing parents about program activities to include opportunities such as: home visits, parent/child conference, family partnership agreement, etc. at the parent orientations, health fairs, open houses, etc.

3. The Management Staff will develop and distribute the Family Engagement Resource Guide annually that promotes to include but are not limited to following:
  - Family Engagement
  - Parent activities that promote child learning and development
  - Community Resources
4. Through the Family Partnerships Agreement process, the family services staff work established family goals and work with the families to achieve their goal on the ongoing basis.

### **Personnel Policies and Decisions**

1. The Deputy Director and the Program Operations Directors will work closely with ALPI's Human Resource Department regarding personnel policies regarding the employment of program staff to include the following:
  - The hiring, evaluation, compensation, and termination of the Executive Director (Chief Executive Officer), Head Start Director, Human Resources Director, and Chief Fiscal Officer (Budget and Finance Director), and any other person in an equivalent position with the agency;
  - The hiring, evaluation, termination, and compensation of employees.
2. The Deputy Director and the Program Operations Directors will submit decisions to hire or terminate any person who works for the ALPI Head Start/Early Head Start program to the Policy Council for approval and to the Board of Directors through the Chief Executive Officer prior to begin employment.
3. The Deputy Director and the Program Operations Directors will be responsible adhere to ALPI's Personnel Policies and Procedures hiring and terminating process.
4. The Deputy Director and the Program Operations Directors will submit ALPI's Personnel Policies and Procedures for approval annually.

## Policy Council Functions and Timelines

<b>August</b>	<ul style="list-style-type: none"> <li>• <b>Approve/disapprove new employees</b></li> <li>• <b>Participate in the parent orientation</b></li> </ul>
<b>September</b>	<ul style="list-style-type: none"> <li>• <b>Establish the Parent Committees – Major items for the Parent Committees are:</b> <ul style="list-style-type: none"> <li>○ Parliamentary procedures training</li> <li>○ Election of Policy Council Representative(s) and Alternate(s)</li> </ul> </li> </ul>
<b>October</b>	<ul style="list-style-type: none"> <li>• <b>Conduct the Policy Council Program Governance Training/Orientation</b> <ul style="list-style-type: none"> <li>○ New Policy Council Members are installed and trained/orientated on to include, but are not limited to the following: <ul style="list-style-type: none"> <li>▪ Head Start Performance Standards</li> <li>▪ Roles and Responsibilities</li> <li>▪ ERSEA 1302.12</li> </ul> </li> </ul> </li> <li>• <b>Facilitate the Policy Council Monthly Meeting</b></li> <li>• <b>Select Policy Council Members to participate in the Annual Parent Conference</b></li> <li>• <b>Select Policy Council Members to participate in the Annual Board of Directors Retreat</b></li> </ul>
<b>November</b>	<ul style="list-style-type: none"> <li>• <b>Facilitate the Policy Council Monthly Meeting</b></li> <li>• <b>Select Policy Council Members to participate in the Board of Directors Annual Retreat to review, and discuss items to include, but are not limited to:</b> <ul style="list-style-type: none"> <li>○ Program Self-Assessment &amp; Improvement Plan</li> <li>○ Staff Qualifications and Development Report</li> <li>○ Child Outcomes</li> <li>○ Program Monitoring Reports</li> </ul> </li> </ul>
<b>December</b>	<ul style="list-style-type: none"> <li>• <b>Facilitate the Policy Council Monthly Meeting. Major items for review, input, and approval/disapproval include:</b> <ul style="list-style-type: none"> <li>○ Management Work Plans, and Operational Policies and Procedures</li> <li>○ Internal Dispute Resolution/Community Compliant Procedures</li> <li>○ Fiscal Management/Personnel Policies and Procedures</li> </ul> </li> </ul>
<b>January</b>	<ul style="list-style-type: none"> <li>• <b>Facilitate the Policy Council Monthly Meeting</b></li> <li>• <b>Recruit Policy Council Members to participate in the Self-Assessment Phase II process</b></li> <li>• <b>Select Policy Council members to participate in the Agency Corporate Annual Meeting</b></li> </ul>
<b>February</b>	<ul style="list-style-type: none"> <li>• <b>Facilitate the Policy Council Monthly Meeting</b> <ul style="list-style-type: none"> <li>○ DHHS ACF – HS/EHS Grant Application planning process begin</li> </ul> </li> <li>• <b>Policy Council, Parents, Board Members, and Staff participate in the Program Self-Assessment Phase II</b></li> <li>• <b>Select Policy Council Members to participate in the Annual Board of Directors Orientation/Training (new board)</b></li> </ul>
<b>March</b>	<ul style="list-style-type: none"> <li>• <b>Facilitate the Policy Council Monthly Meeting – Major items for review, input, and approval include:</b> <ul style="list-style-type: none"> <li>○ Approve/disapprove of Refunding Application</li> <li>○ Program Annual Self-Assessment Report and Improvement Plan</li> </ul> </li> <li>• <b>Select Policy Council Members to participate in the NHSA Training Conference</b></li> </ul>
<b>April</b>	<ul style="list-style-type: none"> <li>• <b>Facilitate the Policy Council Monthly Meeting</b></li> </ul>
<b>May</b>	<ul style="list-style-type: none"> <li>• <b>Facilitate the Policy Council Monthly Meeting</b></li> </ul>
<b>June</b>	<ul style="list-style-type: none"> <li>• <b>Facilitate the Policy Council Monthly Meeting</b></li> <li>• <b>Recruit Policy Council members to participate in the Agency Annual Picnic</b></li> </ul>
<p><b>NOTE: Monthly approvals include, but are not limited to, the following:</b></p> <ul style="list-style-type: none"> <li>→ Program progress reports &amp; Financial reports</li> <li>→ Personnel related issues i.e., hiring, termination, of Head Start/Early Head Start Staff</li> <li>→ Budget revisions (as needed)</li> <li>→ Program changes (as needed)</li> <li>→ Correspondance (DHHS/ACF, NAEYC, ELC, Etc.)</li> <li>→ Other communication (flyers, announcements, etc.)</li> </ul>	

## **Conflict of Interest Policy**

ALPI has established Code of Business Conduct policies and procedures in accordance with the Head Start Act section 642(C) Conflict of Interest. The purpose is to conduct business activities and transactions with honesty and integrity, and in accordance with moral, ethical and legal standards. ALPI's Board of Directors has adopted Code of Business Conduct with apply to agency officers, agency employees or agents. The conflict of interest can be financial, personal relations, status or power.

The code or standard of conduct prohibit real and apparent conflict of interest that may arise among officer, employees, or agents and to prohibit solicitation and acceptance of gifts or gratitude by officer, employees, or agents for their personal benefits in excess or minimal value.

*Refer to Personnel Policies and Procedures Policy 140 – Code of Business Conduct for detail information.*

### **Complaints Procedure- Procedure to Resolve Community Complaints about the Program:**

ALPI's complaint procedure is a problem-solving mechanism in which every attempt is made to resolve issues at the lowest level of authority, with the least possible amount of program disturbance. A written complaint made by a parent and/or legal guardian of a child enrolled in the program or a community member, alleging that Head Start or Early Head Start regulation, agency's Policies and Procedures, and/or Program Policies and Procedures:

- Where not followed; or
- Were administered in a discriminatory (unequal) fashion; or
- Were administered in an arbitrary and capricious (unfair) fashion.

Situations may arise that are not covered by any existing policy or procedures but seem to merit action; these would be addressed in most cases by the development of new policies and procedures that apply to that type of situation in the future.

1. Before a parent and/or legal guardian or a community member can file a complaint direct discussion must take place between the employees with whom the complaint involves. They must make more than one attempt to resolve any problems or conflict at the center level. All parties involved should note the date and time of the informal discussions.
2. If the parent and/or legal guardian or community member complaint is with the top management level of the center, the parent and/or legal guardian or community member may choose to go directly to the # 6 of the procedure.

3. Failing resolution at that level, the person with the complaint must attempt to resolve problems or concerns at the center level with coordinators. More than one meeting must occur prior to the issue becoming a compliant.
4. If the informal discussion process fails, the complaint must be prepared in writing and given to the individual about whom the complaint is made. The staff person about whom the complaint is made will have a maximum of five days to respond after receiving the written complaint.
5. If the complaint is not resolved, or if no action occurs within five working days, the complaint may be presented in writing to their immediate supervisor, who has five working days to hold at least one meeting and to make a recommendation to their immediate supervisor or the program director.
6. If the complaint is not resolved, or if no action occurs within five working days, the complaint may be presented to the program director, who has five working days to hold at least one meeting and make a recommendation to the Chief Executive Officer.
7. If the complaint is not resolved, or if no action occurs within five working days, the complaint may be presented in writing to the Chief Executive Officer and the Policy Council, who has five working days, to schedule at least one meeting and to make a recommendation to the Board of Directors.
8. If satisfactory resolution to the compliant is not made at the Head Start Policy Council or the Chief Executive level, the Board of Directors will review the matter and will give response within five working days.
9. If the findings are appealed to the Board, the Board (or a standing committee of the Board) has the maximum of ten working days to review the matter. If the Board determines that this compliant procedure was followed, the matter is closed as far as the ALPI is concerned and the recommendation of the Chief Executive Officer shall remain in effect.
10. The following concepts will be used for the written compliant procedure:
  - Information is submitted in writing, signed, and dated
  - No anonymous complaints will be a accepted or considered
  - Witnesses may be called at the discretion of the parties involved
  - Supporting information may be submitted
  - The contents of all meetings are kept confidential, unless the complaint is discussed with persons outside of the process. In such a case, staff may discuss the issue with the same persons.

Mediators or other neutral parties may be asked to assist in resolving differences any time after item #6 of this procedure

- Efforts are made to keep the complaint local, involving as few people as possible
- Program officials, parents, and other authorities as appropriate deal with complaint alleging criminal acts or immediate danger to children immediately.

11. Once a person has taken a complaint throughout all of the steps, the complaint may not be returned to the lower level of authority to begin all over again.

12. The complaint procedure applies to all ALPI centers unless an alternate version is developed and approved by the agency and Policy Council.

13. The hierarchy of authority to resolve parent and/or legal guardian or community complaint is as follows:

- Originator (parent and/or legal guardian or community member)
- Immediate Supervisor
- Program Director
- Deputy Director
- Policy Council
- Chief Executive Officer
- ALPI Board of Directors

ALPI HEAD START/EARLY HEAD START  
OPERATIONAL POLICIES AND PROCEDURES  
**PART 1 – PROGRAM GOVERNANCE**

SUBJECT	<b>Program Governance</b>
45 CFR SECTION:	1301.4
PERFORMANCE OBJECTIVE:	To establish and maintain the formation of Parent Committees to provide parents with a broad range of opportunities to participate in the shared decision-making process.

**§1301.4 PARENT COMMITTEES**

(a) Establishing parent committees

ALPI’s Head Start and Early Head Start established the Parent Committees comprised exclusively of the parents and/or legal guardians of current enrolled children as early in the program year (September) at the center-level.

The Parent Committees are established during the first Parent Committee Meeting in the September of the program year. During that meeting, parents and/or legal guardians are given training to include but are limited to the followings:

- How to conduct a meeting using parliamentary procedures
- How to conduct an election of officers process to include Policy Council representatives and alternates
- Overview of program opportunities to include participation in advisory councils, policy council, etc.
- Plan, conduct, and participate in informal and formal programs and activities
- How to become an advocate for early education
- How to be engagement in their child’s education and development in Head Start, Early Head Start and Public School of other school settings.

(b) Requirements of parent committees

ALPI within the parent committees structure determines the best methods to engage families using strategies that are most effective in the community and ensures the parent committees carries out their responsibilities to include advising staff in developing and implementing local program policies, activities, and services to meet the needs of children and families enrolled in the program.

ALPI has established and maintained a system or process of communication with policy council, Board of Directors, parents and the community.

ALPI established policies provide the opportunities to parents to participate in the recruitment and screening of program staff.

## **OPERATIONAL PROCEDURE**

1. The Program Operations Directors are responsible for ensuring that Parent Committees are established and are fully functioning at all Head Start/Early Head Start directly-operated centers and contracted centers in September of the program year.
2. The Child Development Services Managers, and Contracted Center Directors, with the assistance of the Family Services staff, is responsible for facilitating the establishment of the Parent Committee at each individual center in September of the program year.
3. The Child Development Services Managers, and Contracted Center Directors will develop the agenda and ensure that the agenda reflects at a *minimum* the following topics:
  - An overview of the Head Start Performance Standards Program Service Areas
  - Responsibilities of Parents and their rights
  - Program opportunities; i.e., Policy Council, advisory councils, trainings, etc.
  - Upcoming Policy Council and Board of Directors Training/Orientation
  - Training on Parliamentary Procedures
  - Election process
4. The Child Development Services Managers and Contracted Center Directors are responsible for requesting assistance to facilitate the first Parent Committee Meeting and thereafter.
5. After the first meeting in September, the President of the Parent Committee is responsible thereafter for facilitating the monthly Parent Committee Meetings.
6. The Family and Community Partnerships Manager and the Family Support Services Coordinators are responsible for monitoring meetings on a monthly basis to provide support to staff, and parents, and to assist in any questions and/or concerns that parents and/or legal guardians may have.
7. The Child Development Services Managers, and Contracted Center Directors will provide formal and informal communication to parents and/or legal guardians by utilizing various methods of communication such as:
  - Monthly Parent Committee Meetings
  - Home visits
  - Parent/Teacher Conferences
  - Monthly Newsletters, Flyers, announcement, etc.
  - Telephone

8. The formal and informal communication/information provided to parents and/or legal guardians include, but is not limited to the following:
  - Program Policies and Procedures
  - Child's Progress Reports & Child Outcomes/School Readiness results
  - Screening results & Nutrition information
  - Meetings, Trainings, workshops, and community events
  - Home visits & Parent/Teacher Conferences
  - Program Annual Self-Assessment
  
9. The Child Development Services Managers and Contracted Center Directors work closely with parents and/or legal guardians early in the program year, to determine the best methods to engagement families by using to include but limited to the following strategies:
  - Parent Interest Survey
  - Nurturing Fatherhood Survey
  - Family Partnership Agreements
  - Notices/Announcements
  
10. The Child Development Services Manager and Contracted Center Director will facilitate opportunities for parents and/or legal guardians to assist in the following:
  - Advise staff in developing and implementing local program policies, activities, and services to ensure they meet the needs of children and families
  - Have a process of communication with the policy council
  - Within the guidelines established by the Board of Directors, policy council, participate in the screening of Head Start and Early Head Start employees
  
11. The Child Development Services Managers, and Contracted Center Directors will work directly with parents and/or legal guardians to promote the importance and understanding of parent representation in the Policy Council decision-making process including: planning of program activities, funding, etc.

ALPI HEAD START/EARLY HEAD START  
 OPERATIONAL POLICIES AND PROCEDURES  
**PART 1 – PROGRAM GOVERNANCE**

SUBJECT	<b>Program Governance</b>
45 CFR SECTION:	1301.5
PERFORMANCE OBJECTIVE:	To establish and maintain a formal structure for program governance for the oversight of quality services for Head Start children and families and for making decisions related to program design and implementation.

**§1301.5 TRAINING**

- Training - ALPI will provide training and orientation to Board of Director (governing body), and Policy Council to include training on program performance standards, and the §1302.12(m) to ensure that members understand the information provide will effectively allow them to oversee and participate in the program. The training/orientation consist but is limited to:
  - Legal and fiscal responsibilities
  - Composition
  - Duties and Responsibilities
  - Advisory Council
  - Performance Standards
  - §1302.12(m) ERSEA
  
- Training - The program at the center-level will train the parent committee on to conduct meetings, program activities, family engagement opportunities, etc.

Education and Child Development Program Services to include:

- Curriculum
- Screening and Assessments
- School Readiness
- Parent and Family Engagement
- Ongoing Assessment of children

Health Program Services

- 45/90 screenings
- Follow-up and Treatment
- Mental Health
- Nutrition
- Family Support Services

The Board of Directors (governing body) and policy council receive ongoing training after the initial training in various methods to include but are limited to: region conferences, state conferences, agency training, etc.

## **OPERATIONAL PROCEDURE**

1. The Chief Executive Officer is responsible for securing and ensuring the newly seated ALPI Board of Directors receive appropriate training/orientation and technical assistance and to inform them of management procedures and functions necessary to implement a high quality program during the training/orientation in February of the fiscal year.
2. The Chief Executive Officer will work closely with Senior Management Staff (Directors) to ensure compliance that funding training requirements are cover during the training/orientation and thereafter. The training/orientation topics will include but are not limited to:
  - Agency Structure - Composition
  - Funding sources and responsibilities
  - Agency Program Services
  - Board of Directors Structure -Composition
  - Board of Directors Bylaws
  - Agency Policy and Procedures; i.e., Fiscal Management, Personnel, Program Work Plan, and Operations.
  - Internal Dispute Resolution (Impasse) Procedure
  - Grant Applications
  - Agency Annual Audit
  - Community Assessment
  - Five-year Business Plan
  - Child Outcomes/School Readiness
  - Performance Standards
    - §1301.2 Governing body
    - §1301.3 Policy Council
    - §1301.4 Parent Committees
    - §1302.12 (m)
3. The Chief Executive Officer will facilitate the Board of Directors election process during the training/orientation in February; which election will consist of the following positions:
  - Chairperson
  - Vice-Chairperson
  - Treasurer
  - Secretary

4. The Chief Executive Officer is responsible to provide information to the ALPI Board of Directors on a monthly, bi-monthly, annual basis or as needed. This information will include, but not be limited to the following:
  - Financial Reports
  - Program growth, improvement, development, etc.
  - Self-Assessment/Audits
  - Federal Reviews
  - Funding applications and amendments
  - Criteria for recruitment, selection, and enrollment of children
  - Program enrollment and attendance to including VPK children
  - Program USDA monthly reports (meals and snacks)
  
5. The Chief Executive Officer will work under the direction of the Board of Director to establish and maintain major timelines, meeting schedules, etc. These timelines will include but are not limited to the following:
  - Conferences
  - Board Retreat
  - Board Meetings
  - Board Orientation/Training
  - Grant Developments and Approvals
  - Annual Self-Assessment
  
6. The Deputy Director and Program Operations Director will be responsible to ensure that the Policy Council participate in joint activities with the Board of Director to include: Board of Directors Retreat, Annual Self-Assessments, Board Orientation/Training, etc.
  
7. The Deputy Director and the Program Operations Directors are responsible for securing and ensuring the newly elected Policy Council receive appropriate training/orientation and technical assistance and to inform them of management procedures and functions necessary to implement a high quality program during the training/orientation in October of the school year.
  
8. The Deputy Director and Program Operations Director will work closely with the program's Management Staff to ensure compliance that funding training requirements are cover during the training/orientation and thereafter. The training/orientation topics will include but are not limited to:
  - Agency Structure - Composition
  - Agency Program Services
  - Board of Directors Structure -Composition
  - Policy Council – Composition

- Policy Council Bylaws
  - Internal Dispute Resolution (Impasse) Procedure
  - Grant Applications
  - Agency Annual Audit
  - Community Assessment
  - Five-year Business Plan
  - Child Outcomes/School Readiness
  - Performance Standards
    - §1301.2 Governing body (Board of Directors)
    - §1301.3 Policy Council
    - §1301.4 Parent Committees
    - §1302.12 (m)
9. The Deputy Director, Program Operations Director or designee will facilitate the Policy Council election process during the training/orientation in October or at the first monthly meeting in October; which election will consist of the following positions:
- Chairperson
  - Vice-Chairperson
  - Treasurer
  - Secretary
10. The Deputy Director and the Program Operations are responsible to provide information to the Policy Council on a monthly, annual basis or as needed. This information will include, but not be limited to the following:
- Financial Reports
  - Program growth, improvement, development, etc.
  - Self-Assessment/Audits
  - Federal Reviews
  - Funding applications and amendments
  - Criteria for recruitment, selection, and enrollment of children
  - Program enrollment and attendance to including VPK children
  - Program USDA monthly reports (meals and snacks)
11. The Deputy Director and Program Operations Directors will facility the development of major timelines and meeting schedule, etc. These timelines will include but are not limited to the following:
- Conferences
  - Policy Council Orientation/Training
  - Monthly Meetings
  - Board Retreat & Board Meetings

- Board Orientation/Training
- Grant Developments and Approvals
- Annual Self-Assessment

**ALPI HEAD START/EARLY HEAD START  
OPERATIONAL POLICIES AND PROCEDURES  
PART 1 – PROGRAM GOVERNANCE**

<b>SUBJECT</b>	<b>Program Governance</b>
<b>45 CFR SECTION:</b>	1301.6
<b>PERFORMANCE OBJECTIVE:</b>	To establish and maintain a procedure to settle disputes and resolve impasses between the ALPI’s Board of Directors and the Head Start and Early Head Start Policy Council.

**§1301.6 IMPASSE PROCEDURES**

(a) ALPI will establish and maintain procedures that facilitate a meaningful consultation about decisions of the governing body (Board of Directors) and the policy council. These procedures allow members to solve internal disputes between the governing body (Board of Directors) and policy council in a timely manner that include impasse procedures. These procedures include:

- Demonstrate that the governing body (Board of Directors) considers proposed decisions from the policy council and that the policy council considers proposed decisions from the governing body (Board of Directors);
- If there is a disagreement, require the governing body (Board of Directors) and the policy council to notify the other in writing why it does not accept a decision; and
- Describe a decision-making process and a timeline to resolve disputes and reach decisions that are not arbitrary, capricious, or illegal.

(b) If ALPI’s decision-making process does not result in a resolution and an impasse continues, the governing body (Board of Directors) and policy council will select a mutually agreeable third party mediator and participate in a formal process of mediation that leads to a resolution of the dispute.

(c) ALPI, if not resolution is reached with a mediator, the governing body (Board of Directors) and policy council will select mutually agreeable arbitrator whose decision is final.

**OPERATIONAL PROCEDURES**

1. When ALPI Head Start/Early Head Start Policy Council and the Board of Directors (governing body) reach an impasse on issues requiring the approval of both bodies, the following procedures will be implemented:

- The Chairperson of the Board of Directors may elect to schedule a jointly called meeting of the Board with the full membership of the Policy Council, and/or the chairpersons of each body may each appoint three members to a “Dispute Resolution” Committee, functioning as a special committee of the Board of Directors. The joint bodies or committee shall meet at a mutually agreeable time and place to discuss the impasse issue(s) informally, and institute all good faith efforts to resolve the dispute in a manner acceptable to both bodies.
- Recommendations developed and approved unanimously by the Dispute Resolution Committee and/or recommendations arising from the joint meeting will be presented for approval to both bodies.
- If the committee and/or combined bodies fail to negotiate the issue, formal procedures shall be implemented. All mediation or subsequent dispute resolution discussions will remain confidential among members of the two bodies.
- The Dispute Resolution Committee, if not previously established, will be appointed by the chairpersons of each body, and meet to select a qualified neutral third party to serve as a Mediator to assist the bodies in resolving the impasse. The Mediator shall not arbitrate, judge nor decide the dispute for the parties, but will work to gain the trust of both parties and then use his/her knowledge and skills to help the parties focus their interest and goals in order to come to an agreement that meets their individual and mutual objectives. If the committee cannot agree upon a mediator, chairpersons of the both bodies will recall members and appoint new representatives to the committee.
- The mediator is strictly prohibited from discussing the case with anyone outside the mediation process, so that no one who might be involved in a possible later adjudication will have any knowledge of what happened during mediation. Fees for mediation services may be charged to the program grant and/or discretionary funds of the Board of Directors.
- Although either body is free to consult with legal counsel at any time, the mediation process shall not require parties to have attorneys.
- In the event that the impasse cannot be resolved by mediation, the Board of Directors will notify the assigned Program Specialist at the Regional Office. Both bodies may elect to enter into binding arbitration (by individual panel) following procedures developed and approved by both Policy Council and Board of Directors. If either party refuses to engage in arbitration, the Board of Directors may elect to enter the judicial system to resolve disputes.

2. During the course of informal and formal efforts to resolve the dispute, no related actions shall be implemented unless approved by both bodies. If the conflict places the program or agency in jeopardy of losing funding, violation of local, state and federal statutes, endangering the health and safety of staff, parents and/or legal guardians, participants, or the public; or involves an emergency situation requiring immediate action, the Board of Directors has the authority to seek approval from the funding agency, local, state, or federal authorities (if applicable) and/or the judicial system to implement such actions as it deems warranted.
  
3. Once the dispute is resolved, such corrective actions or reparations deemed by the mediated, arbitrated, or judicial decision accepted shall be implemented.

**Complaints Procedure- *Procedure to Resolve Community Complaints about the Program:***

ALPI's complaint procedure is a problem-solving mechanism in which every attempt is made to resolve issues at the lowest level of authority, with the least possible amount of program disturbance. A written complaint made by a parent and/or legal guardian of a child enrolled in the program or a community members, alleging that Head Start or Early Head Start regulation, agency's Policies and Procedures, and/or Program Policies and Procedures:

- Where not followed; or
- Were administered in a discriminatory (unequal) fashion; or
- Were administered in an arbitrary and capricious (unfair) fashion.

Situations may arise that are not covered by any existing policy or procedures but seem to merit action; these would be addressed in most cases by the development of new policies and procedures that apply to that type of situation in the future.

14. Before a parent and/or legal guardian or a community member can file a complaint direct discussion must take place between the employees with whom the complaint involves. They must make more than one attempt to resolve any problems or conflict at the center level. All parties involved should note the date and time of the informal discussions.
15. If the parent and/or legal guardian or community member complaint is with the top management level of the center, the parent and/or legal guardian or community member may choose to go directly to the # 6 of the procedure.
16. Failing resolution at that level, the person with the complaint must attempt to resolve problems or concerns at the center level with coordinators. More than one meeting must occur prior to the issue becoming a complaint.
17. If the informal discussion process fails, the complaint must be prepared in writing and given to the individual about whom the complaint is made. The staff person about whom the complaint is made will have a maximum of five days to respond after receiving the written complaint.
18. If the complaint is not resolved, or if no action occurs within five working days, the complaint may be presented in writing to their immediate supervisor, who has five working days to hold at least one meeting and to make a recommendation to their immediate supervisor or the program director.
19. If the complaint is not resolved, or if no action occurs within five working days, the complaint may be presented to the program director, who has five working days to hold at

least one meeting and make a recommendation to the Chief Executive Officer.

20. If the complaint is not resolved, or if no action occurs within five working days, the complaint may be presented in writing to the Chief Executive Officer and the Policy Council, who has five working days, to schedule at least one meeting and to make a recommendation to the Board of Directors.
21. If satisfactory resolution to the complaint is not made at the Head Start Policy Council or the Chief Executive level, the Board of Directors will review the matter and will give response within five working days.
22. If the findings are appealed to the Board, the Board (or a standing committee of the Board) has the maximum of ten working days to review the matter. If the Board determines that this compliant procedure was followed, the matter is closed as far as the ALPI is concerned and the recommendation of the Chief Executive Officer shall remain in effect.
23. The following concepts will be used for the written compliant procedure:
  - Information is submitted in writing, signed, and dated
  - No anonymous complaints will be accepted or considered
  - Witnesses may be called at the discretion of the parties involved
  - Supporting information may be submitted
  - The contents of all meetings are kept confidential, unless the complaint is discussed with persons outside of the process. In such a case, staff may discuss the issue with the same persons.
  - Mediators or other neutral parties may be asked to assist in resolving differences any time after item #6 of this procedure
  - Efforts are made to keep the compliant local, involving as few people as possible
  - Program officials, parents, and other authorities as appropriate deal with compliant alleging criminal acts or immediate danger to children immediately.
24. Once a person has taken a compliant throughout all of the steps, the compliant may not be returned to the lower level of authority to begin all over again.
25. The compliant procedure applies to all ALPI centers unless an alternate version is developed and approved by the agency and Policy Council.
26. The hierarchy of authority to resolve parent and/or legal guardian or community compliant is as follows:
  - Originator (parent and/or legal guardian or community member)
  - Immediate Supervisor

- Program Director
- Deputy Director
- Policy Council
- Chief Executive Officer
- ALPI Board of Directors

# PROGRAM GOVERNANCE

HSPPS TRAINING

§ 1302.12 Determining, Verifying, and  
Documenting Eligibility

FEBRUARY 26, 2022

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## Leadership and Governance

Leadership and governance are the bedrocks of effective management. Head Start program leadership consists of three key entities: the Governing Body/Tribal Council, Policy Council, and management staff. The Governing Body/Tribal Council assumes legal and fiscal responsibility for the program. The Policy Council sets direction. Management staff oversees day-to-day operations. Together, they are a powerful force that provides leadership and strategic direction.



- Part 1301 – Program Governance

- § 1301.1 Purpose

- § 1301.2 Governing Body

- § 1301.3 Policy council and policy committee

- § 1301.4 Parent Committees

- § 1301.5 Training: **An agency MUST provide appropriate training and technical assistance or orientation to the governing body, any advisory committee members, and the policy council, including training on program performance standards and training indicated in 1302.12(m) to ensure the members understand the information they receive and can effectively oversee and participate in the program in the Head Start agency.**

- § 1301.6 Impasse procedures

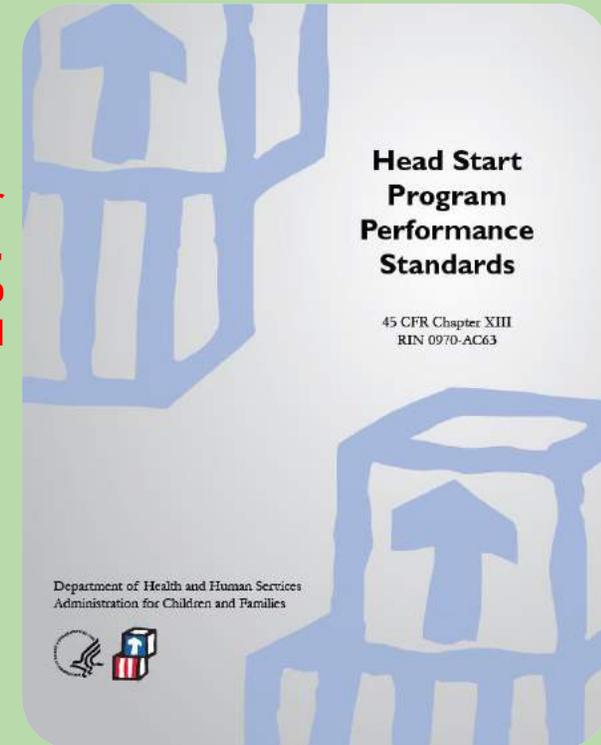
- Part 1302 – Program Overview

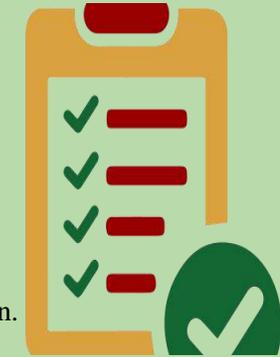
- §1302 Subpart A – Eligibility, Recruitment, Selection, Enrollment, and Attendance**

- §1302.10 Purpose

- §1302.11 Determining community strengths, needs, and resources

- §1302.12 Determining, verifying, and documenting eligibility**





**(a) Process overview**

(1) Program staff must:

- (i) Conduct an in-person interview with each family, unless paragraph (a)(2) of this section applies;
- (ii) Verify information as required in paragraphs (h) and (i) of this section; and,
- (iii) Create an eligibility determination record for enrolled participants according to paragraph (k) of this section.

(2) Program staff may interview the family over the telephone if an in-person interview is not possible or convenient for the family.

(3) If a program has an alternate method to reasonably determine eligibility based on its community assessment, geographic and administrative data, or from other reliable data sources, it may petition the responsible HHS official to waive requirements in paragraphs (a)(1)(i) and (ii) of this section.

**(b) Age requirements**

(1) For Early Head Start, except when the child is transitioning to Head Start, a child must be an infant or a toddler younger than three years old.

(2) For Head Start, a child must:

- (i) Be at least three years old or, turn three years old by the date used to determine eligibility for public school in the community in which the Head Start program is located; and,
- (ii) Be no older than the age required to attend school.

(3) For Migrant or Seasonal Head Start, a child must be younger than compulsory school age by the date used to determine public school eligibility for the community in which the program is located.

**(c) Eligibility requirements**

(1) A pregnant woman or a child is eligible if:

- (i) The family's income is equal to or below the poverty line; or,
- (ii) The family is eligible for or, in the absence of child care, would be potentially eligible for public assistance; including TANF child-only payments, or,
- (iii) The child is homeless, as defined in part 1305; or,
- (iv) The child is in foster care.

(2) If the family does not meet a criterion under paragraph (c)(1) of this section, a program may enroll a child who would benefit from services, provided that these participants only make up to 10 percent of a program's enrollment in accordance with paragraph (d) of this section.

**(d) Additional allowances for programs**

(1) A program may enroll an additional 35 percent of participants whose families do not meet a criterion described in paragraph (c) of this section and whose incomes are below 130 percent of the poverty line, if the program:

- (i) Establishes and implements outreach, and enrollment policies and procedures to ensure it is meeting the needs of eligible pregnant women, children, and children with disabilities, before serving pregnant women or children who do not meet the criteria in paragraph (c) of this section; and,
- (ii) Establishes criteria that ensure pregnant women and children eligible under the criteria listed in paragraph (c) of this section are served first.

(2) If a program chooses to enroll participants who do not meet a criterion in paragraph (c) of this section, and whose family incomes are between 100 and 130 percent of the poverty line, it must be able to report to the Head Start regional program office:

- (i) How it is meeting the needs of low-income families or families potentially eligible for public assistance, homeless children, and children in foster care, and include local demographic data on these populations;
- (ii) Outreach and enrollment policies and procedures that ensure it is meeting the needs of eligible children or pregnant women, before serving over-income children or pregnant women;
- (iii) Efforts, including outreach, to be fully enrolled with eligible pregnant women or children;
- (iv) Policies, procedures, and selection criteria it uses to serve eligible children;
- (v) Its current enrollment and its enrollment for the previous year;
- (vi) The number of pregnant women and children served, disaggregated by the eligibility criteria in paragraphs (c) and (d)(1) of this section; and,
- (vii) The eligibility criteria category of each child on the program's waiting list.



**g) Eligibility requirements for communities with 1,000 or fewer individuals**

- (1) A program may establish its own criteria for eligibility provided that it meets the criteria outlined in section 645(a)(2) of the Act.
- (2) No child residing in such community whose family is eligible under criteria described in paragraphs (c) through (f) of this section, may be denied an opportunity to participate in the program under the eligibility criteria established under this paragraph (g).

**(h) Verifying age**

Program staff must verify a child's age according to program policies and procedures. A program's policies and procedures cannot require families to provide documents that confirm a child's age, if doing so creates a barrier for the family to enroll the child.

**(i) Verifying eligibility**

- (1) To verify eligibility based on income, program staff must use tax forms, pay stubs, or other proof of income to determine the family income for the relevant time period.
  - (i) If the family cannot provide tax forms, pay stubs, or other proof of income for the relevant time period, program staff may accept written statements from employers, including individuals who are self-employed, for the relevant time period and use information provided to calculate total annual income with appropriate multipliers.
  - (ii) If the family reports no income for the relevant time period, a program may accept the family's signed declaration to that effect, if program staff describes efforts made to verify the family's income, and explains how the family's total income was calculated or seeks information from third parties about the family's eligibility, if the family gives written consent. If a family gives consent to contact third parties, program staff must adhere to program safety and privacy policies and procedures and ensure the eligibility determination record adheres to paragraph (k)(2) of this section.
  - (iii) If the family can demonstrate a significant change in income for the relevant time period, program staff may consider current income circumstances.

(2) To verify whether a family is eligible for, or in the absence of child care, would be potentially eligible for public assistance, the program must have documentation from either the state, local, or tribal public assistance agency that shows the family either receives public assistance or that shows the family is potentially eligible to receive public assistance.

(3) To verify whether a family is homeless, a program may accept a written statement from a homeless services provider, school personnel, or other service agency attesting that the child is homeless or any other documentation that indicates homelessness, including documentation from a public or private agency, a declaration, information gathered on enrollment or application forms, or notes from an interview with staff to establish the child is homeless; or any other document that establishes homelessness.

(i) If a family can provide one of the documents described in this paragraph (i)(3), program staff must describe efforts made to verify the accuracy of the information provided and state whether the family is eligible because they are homeless.

(ii) If a family cannot provide one of the documents described in paragraph (i)(3) to prove the child is homeless, a program may accept the family's signed declaration to that effect, if, in a written statement, program staff describe the child's living situation that meets the definition of homeless in part 1305 of this chapter.

(iii) Program staff may seek information from third parties who have firsthand knowledge about a family's living situation, if the family gives written consent. If the family gives consent to contact third parties, program staff must adhere to program privacy policies and procedures and ensure the eligibility determination record adheres to paragraph (k) of this section.

(4) To verify whether a child is in foster care, program staff must accept either a court order or other legal or government-issued document, a written statement from a government child welfare official that demonstrates the child is in foster care, or proof of a foster care payment.

**(j) Eligibility duration**

(1) If a child is determined eligible under this section and is participating in a Head Start program, he or she will remain eligible through the end of the succeeding program year except that the Head Start program may choose not to enroll a child when there are compelling reasons for the child not to remain in Head Start, such as when there is a change in the child's family income and there is a child with a greater need for Head Start services.

(2) Children who are enrolled in a program receiving funds under the authority of section 645A of the Act remain eligible while they participate in the program.

(3) If a child moves from an Early Head Start program to a Head Start program, program staff must verify the family's eligibility again.

(4) If a program operates both an Early Head Start and a Head Start program, and the parents wish to enroll their child who has been enrolled in the program's Early Head Start, the program must ensure, whenever possible, the child receives Head Start services until enrolled in school, provided he child is eligible.



**(k) Records**

(1) A program must keep eligibility determination records for each participant and ongoing records of the eligibility training for staff required by paragraph (m) of this section. A program may keep these records electronically.

(2) Each eligibility determination record must include:

(i) Copies of any documents or statements, including declarations, that are deemed necessary to verify eligibility under paragraphs (h) and (i) of this section;

(ii) A statement that program staff has made reasonable efforts to verify information by:

(A) Conducting either an in-person, or a telephone interview with the family as described under paragraph (a)(1)(i) or (a)(2) of this section; and,

(B) Describing efforts made to verify eligibility, as required under paragraphs (h) through (i) of this section; and, collecting documents required for third party verification that includes the family's written consent to contact each third party, the third parties' names, titles, and affiliations, and information from third parties regarding the family's eligibility.

(iii) A statement that identifies whether:

(A) The family's income is below income guidelines for its size, and lists the family's size;

(B) The family is eligible for or, in the absence of child care, potentially eligible for public assistance;

(C) The child is a homeless child or the child is in foster care;

(D) The family was determined to be eligible under the criterion in paragraph (c)(2) of this section; or,

(E) The family was determined to be eligible under the criterion in paragraph (d)(1) of this section.

(3) A program must keep eligibility determination records for those currently enrolled, as long as they are enrolled, and, for one year after they have either stopped receiving services; or are no longer enrolled.

1) *Program policies and procedures on violating eligibility determination regulations.* A program must establish written policies and procedures that describe all actions taken against staff who intentionally violate federal and program eligibility determination regulations and who enroll pregnant women and children that are not eligible to receive Early Head Start or Head Start services.



**(m) Training on eligibility**

(1) A program must train all governing body, policy council, management, and staff who determine eligibility on applicable federal regulations and program policies and procedures. Training must, at a minimum:

(i) Include methods on how to collect complete and accurate eligibility information from families and third party sources;

(ii) Incorporate strategies for treating families with dignity and respect and for dealing with possible issues of domestic violence, stigma, and privacy; and,

(iii) Explain program policies and procedures that describe actions taken against staff, families, or participants who attempt to provide or intentionally provide false information.

(2) A program must train management and staff members who make eligibility determinations within 90 days of hiring new staff.

(3) A program must train all governing body and policy council members within 180 days of the beginning of the term of a new governing body or policy council.

(4) A program must develop policies on how often training will be provided after the initial training.

## OVERVIEW

ALPI has developed, established and maintained methods and processes to ensure that the neediest families and their children are recruited by utilizing data from the community assessment that reflects the community strengths, needs and priorities. These methods and processes are designed in a policy and procedures format to provide detailed and/or step by step processes.

The following information represents ALPI's methods and processes:

☐ Eligibility, collection of data, and accuracy information from families and third party sources.

a. Intake – An intake is conducted by interviewing the parent(s) and collecting the eligibility information that includes the following:

### **Age requirement-**

For Early Head Start, a child must be an infant or a toddler younger than three years old.

For Head Start, a child must be at least three years old or turn three by September 1<sup>st</sup> of that year and no older than the age required to attend school.

### **Eligibility Requirement-**

A pregnant women or a child is eligible if:

The family income is equal to or below the poverty line or

The family is eligible for or receives public assistance (SSI) or TANF (child only payments) or

The child is homeless or

The child is in foster care.

If a family doesn't meet the above criterion, the program may enroll a child who will benefit from services but exceeds the income poverty line but are below 130 percent. (Only up to 10% of **enrolled** families can fall in this category)

### **Verifying Eligibility-**

To verify eligibility based on income, staff will use tax forms, pay stubs or other proof of income to determine family income for the **relevant time period**. (Staff may also use other proof as written statements from employers, self declarations, etc.)

For families that receive public assistance, staff must have documentation from either the state or local public assistance agency that shows family is either receiving assistance or eligible for.

For families that are homeless, staff may accept a written statement from a homeless services provider, school personnel or other service agency attesting that the child is homeless ( all families will complete a Homeless verification form)

For families in foster care, staff must accept either a court order or other legal government issued document, a written statement from a government welfare official that shows child in foster care or proof of foster care payments.

ELIGIBILITY TYPE	Mark all that Apply
Homeless (as defined by McKinney-Vento Act)	120
Foster Child	120
Public Assistance (TANF/SSI)	120
Below or at the HHS poverty guidelines	120
INCOME	POINTS
Income is between 100% - 130% of the HHS poverty guidelines	45
Income is over 130% of the HHS poverty guidelines	35
AGE (By Compulsory School Age) – Head Start	
Age 4 by September 1, 2017	85
Age 3 by September 1, 2017	75
AGE (By Compulsory School Age) – Early Head Start	
Birth to 36 months	85
OTHER FACTORS	
Single, Working Parent	45
Transition from Early Head Start	20
Sibling currently enrolled in program	15
Legal Guardianship	10
Teen Parent (At time of application)	5
DISABILITY (Must be Documented)	
Documented disability, diagnosed with IEP from LEA- (HS)	95
Referred by Part C- Disability IFSP- (EHS)	95
<b>Total Points</b>	



*How We Prioritize Eligibility...*

ALPI uses a Selection Criteria Scale that is updated, and approved annually.



### **Eligibility Duration-**

- When a child is deemed eligible for services, the child remains eligible through the end of the succeeding program year except in the Head Start program, **the staff may choose not to enroll a child when there are compelling reasons for the child not to remain in the program such as a change in family's income or there is a child with a greater need.**
- When a child is enrolled in Early Head Start and moves to Head Start, the staff must re-verify the family's income again to determine eligibility.

### **Records-**

A program must keep eligibility determination records for each child enrolled in the program.

Each record must include:

- Copies of any documents used to determine eligibility (income)
- A statement verifying a in-person or telephone interview was conducted
- Efforts made to verify eligibility (third-party verification, family consents, etc.)
- A statement that identifies what way the family was eligible (income, public assistance, homeless, foster care)

All records must be kept on currently enrolled children and maintained for one year after they have stopped receiving services or are no longer enrolled.

### **Maintenance of data/records collected –**

- Eligibility and enrollment information collected through the intake and enrollment process/method is maintained at an automated and manual recordkeeping system, that is designed to manage dynamic processes and mechanisms to maintain an effective and efficient recordkeeping system that captures and produces timely and accurate agency and program information regarding families and children.
- MyHeadstart is utilized to maintain eligibility, verification, and track children and families. Information includes, but is not limited to the following: name, income, family size, verification, demographic, enrollment, health, screenings and results, family needs assessment, drops, transfers, replacements, attendance, home visits, follow up, services rendered, etc.
- Data/records collected are confidential and align with agency Standards of Conduct.

### **Treatment of families –**

- Family Services Staff through the New Employee Orientation receive at a minimum three (3) days of orientation following with onsite mentoring and coaching processes serving as training and technical assistance. This process includes but are not limited to:
  - Eligibility determination
  - Recordkeeping system (automated and manual)
  - Confidentiality
  - Interview strategies for treating families with dignity and respect for dealing with possible issues of domestic violence, stigma, and privacy
  - Community resources and referral processes.
- Family Services Staff receives annual refreshment trainings as part of the Professional Development Plan.

### **Policies and Procedures –**

ALPI's Personnel Policies and Procedures, Policy 265 Standards of Conduct are aligned with the performance standards section 1302.12(m)(iii) regarding actions taken against staff, families, or participants who attempt to provide or intentionally provide false information.

To enhance these policies and procedures and to ensure that staff and parents adhere to these policies; the following forms are presented to the staff as part of the orientation process and to the parents as part of the intake process:

The Agricultural and Labor Program, Inc.  
Head Start/Early Head Start Program  
FRAUD AFFIDAVIT

**STATEMENT:**

In accordance with 1302.12 (l): Program policies and procedures on violating eligibility determination regulations. A program must establish written policies and procedures that describe all actions taken against staff who intentionally violate federal and program eligibility determination regulations and who enroll pregnant women and children that are not eligible to receive Early Head Start or Head Start services (*Head Start Performance Standards*).

Therefore, **this is to certify that as an employee (Family Services Staff)** of the Agricultural and Labor Program, Inc., I will adhere to all the Federal and Program Eligibility determination regulations in order to enroll pregnant women and children for Head Start and Early Head Start. It is also understood that no special privileges will be given to staff and/or our families.

**ACTIONS CONSTITUTING FRAUD ARE NOT LIMITED TO:**

- Intentionally omitting one parents income in a two working parent's home
- Coaching parents to intentionally complete/omit information to be eligible for the program
- Falsely claiming to have no income (Completion of Zero Income Affidavit)
- Creation of fictitious family members in order to make family size larger
- Completing applications on known family members, self and/or that may live in the same household as employee
- Accepting bribes from families of material or monetary value in exchange for eligibility in the program
- Deliberately falsifying documents to make a family eligible for the program.

**I HAVE READ AND UNDERSTAND THE ABOVE STATEMENT REGARDING ELIGIBILITY AND FRAUD. I AM ALSO AWARE THAT ANY VIOLATION OF THE MENTIONED POLICY WILL DEEM FOR FURTHER DISCIPLINARY ACTIONS TO BE TAKEN BASED ON THE AGENCY POLICY #265 STANDARDS OF CONDUCT.**

\_\_\_\_\_  
Staff Signature

\_\_\_\_\_  
Date

The Agricultural and Labor Program, Inc.  
Head Start/Early Head Start Program  
FRAUD AFFIDAVIT

**STATEMENT:**

In accordance with 1302.12 (l): Program policies and procedures on violating eligibility determination regulations. A program must establish written policies and procedures that describe all actions taken against staff who intentionally violate federal and program eligibility determination regulations and who enroll pregnant women and children that are not eligible to receive Early Head Start or Head Start services (*Head Start Performance Standards*).

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**I HAVE READ AND UNDERSTAND THE ABOVE STATEMENT REGARDING ELIGIBILITY AND FRAUD. I AM ALSO AWARE THAT ANY VIOLATION OF THE MENTIONED POLICY WILL DEEM FOR FURTHER DISCIPLINARY ACTIONS TO BE TAKEN BASED ON THE AGENCY POLICY #265 STANDARDS OF CONDUCT.**

\_\_\_\_\_  
Staff Signature

\_\_\_\_\_  
Date

### **Staff Training –**

ALPI provides training to management staff and family services staff who make eligibility determination for new employees during the new employee's orientation (prior to working with families) and annually to all family services staff as part of the professional development and the annual training and technical assistance plan.

### **Governing Body and Policy Council Training –**

- ALPI annually seats the newly elected governing body during the agency corporate luncheon in January of each year
- The governing body annually receives training during the governing body orientation in February of each year to include but are not limited to:
  - Legal and fiscal responsibilities
  - Composition
  - Duties and responsibilities
  - Advisory committees
  - Performance Standards
  - ERSEA Requirements
- ALPI's Head Start and Early Head Start Program annually seats the newly elected policy council during the month of October of each year
- The policy council annually receives training during the policy council orientation in October of each year to include but are not limited to:
  - Policy council responsibilities
  - Composition
  - Duties and responsibilities
  - Term
  - Reimbursement
  - Performance Standards
  - ERSEA Requirements

### **Governing Body and Policy Council Ongoing Training –**

The governing body and policy council receive ongoing training after the initial training in various methods to include but are not limited to: region conferences, state conferences, agency trainings, etc.

## *How We Train...*



## References

- ECLKC – Early Childhood Learning & Knowledge Center
- ACF.HHS.Gov – Administration for Children and Families – Department of Health and Human Services
- Head Start Program Performance Standards
- Head Start Act
- ALPI’s Policies and Procedures

*Thank you!*

# STANDARDS



## CENTER OF EXCELLENCE DEVELOPED CSBG ORGANIZATIONAL STANDARDS

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Community Action Partnership  
1140 Connecticut Avenue, NW, Suite 1210  
Washington, DC 20036  
202.265.7546 | FAX 202.265.5048  
[WWW.COMMUNITYACTIONPARTNERSHIP.COM](http://WWW.COMMUNITYACTIONPARTNERSHIP.COM)

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# Introduction

In 2012, the Federal Office of Community Services (OCS) provided funding to establish the CSBG Organizational Standards Center of Excellence (COE). The COE was charged with developing a set of organizational standards designed to ensure that CSBG Eligible Entities (CEEs) have the capacity to provide high-quality services to low-income families and communities. The Community Action Partnership received this funding and engaged and expanded the existing CSBG Working Group to spearhead these efforts. The Partnership and the CSBG Working Group involved the breadth of CSBG Network including CSBG Eligible Entities/Community Action Agencies, CSBG State Lead Agencies/Offices, Community Action State Associations, National CSBG Partners (CAPLAW, NASCSP, NCAF), content experts, and others to develop this comprehensive set of CSBG organizational standards.

The initial effort included an intensive 9-month process of listening sessions, literature reviews, surveys, and field testing that resulted in a draft of the CSBG organizational standards being provided to OCS in July 2013. Readers of this document are encouraged to access the July 2013 submission to review the project's full background, standards development process, and implementation recommendations. In March 2014, OCS published a draft information memorandum (IM) including the proposed organizational standards, providing potential implementation recommendations and seeking additional input from the Network.

In January 2015, OCS released [IM 138, State Establishment of Organizational Standards for CSBG Eligible Entities under 678B of the CSBG Act, 42.U.S.C § 9914](#). IM 138 provides direction to States, the District of Columbia, U.S. Territories, and CEEs on establishing organizational standards by FY 2016 and includes the final wording of the standards developed by the Organizational Standards COE.

The Standards were developed in three thematic groups, comprising nine categories with the final set including 58 Standards for private/nonprofit CEEs and 50 for public/governmental entity CEEs. These categories include:

## **Maximum Feasible Participation**

- Consumer Input and Involvement
- Community Engagement
- Community Assessment

## **Vision and Direction**

- Organizational Leadership
- Board Governance
- Strategic Planning

## **Operations and Accountability**

- Human Resource Management
- Financial Operations and Oversight
- Data and Analysis

The COE-developed organizational standards work together to characterize an effective and healthy organization. Some of the Standards have direct links to the CSBG Act, such as the standards on the tripartite board structure and the democratic selection process. Some Standards link with U.S. Office of Management and Budget (OMB) guidance, such as the standards on audits. As a whole, the standards reflect many of the requirements of the CSBG Act, applicable Federal laws and regulations, good management practices, and the values of Community Action.

This document provides the final language for the final COE-developed organizational standards. Additional resources can be found on the Partnership's website at [www.communityactionpartnership.com](http://www.communityactionpartnership.com) and include Assessment Tools and a Glossary of Terms. These resources are designed to assist CEEs and States with assessing

CEEs against the organizational standards, provide clarity as to terms and activities, and offer non-binding guidance as to the intent of individual standards and how to demonstrate meeting them.

This document and other tools referenced are the work of the Organizational Standards Center of Excellence and the Community Action Partnership. Readers are encouraged to refer to IM 138 for OCS-guidance regarding the CSBG Organizational standards.

If you have questions about this document, please contact:

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For the purposes of this document, the following definitions apply:

**Private CSBG-Eligible Entity** - Nonprofit 501(c) (3) organizations serving local communities that are eligible to receive Community Services Block Grant funding. These nonprofit entities are governed by a tripartite board of directors, run operationally by an Executive Director or CEO, and may receive funding from a variety of public and private sources.

**Public CSBG-Eligible Entity** - Units of local governmental entities, such as a county or city government, eligible to receive Community Services Block Grant funding. Many “Public CEEs” operate programs directly out of the government/municipal department while others subcontract to nonprofits in their communities to provide services. They are advised by a tripartite board/advisory body.

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# MAXIMUM FEASIBLE PARTICIPATION

## CATEGORY ONE: Consumer Input and Involvement

Community Action is rooted in the belief that people with low incomes are in the best position to express what they need to make a difference in their lives. CSBG eligible entities work in partnership with the people and communities they serve. Community Action works in a coordinated and comprehensive manner to develop programs and services that will make a critical difference in the lives of participants. Individuals and families are well attuned to what they need, and when Community Action taps into that knowledge, it informs our ability to implement high-impact programs and services.

Research shows that through engagement in community activities such as board governance, peer to peer leadership, advisory bodies, volunteering, and other participatory means, the poor build personal networks and increase their social capital so that they are able to move themselves and their families out of poverty. Community Action is grounded in helping families and communities build this social capital for movement to self-sufficiency.

**Standard 1.1 | Private**      **The organization demonstrates low-income individuals' participation in its activities.**

**Standard 1.1 | Public**      **The department demonstrates low-income individuals' participation in its activities.**

**Standard 1.2 | Private**      **The organization analyzes information collected directly from low-income individuals as part of the community assessment.**

**Standard 1.2 | Public**      **The department analyzes information collected directly from low-income individuals as part of the community assessment.**

**Standard 1.3 | Private**      **The organization has a systematic approach for collecting, analyzing, and reporting customer satisfaction data to the governing board.**

**Standard 1.3 | Public**      **The department has a systematic approach for collecting, analyzing, and reporting customer satisfaction data to the tripartite board/advisory body, which may be met through broader local government processes.**

## CATEGORY TWO: Community Engagement

No CSBG eligible entity can meet all of a community's needs independently. Through formal and informal partnerships, ongoing community planning, advocacy, and engagement of people with low incomes, partners ranging from community and faith-based organizations, educational institutions, government, and business work together with Community Action Agencies and other CSBG eligible entities to successfully move families out of poverty and revitalize communities.

Community Action is often the backbone organization of community efforts to address poverty and community revitalization: leveraging funds, convening key partners, adding the voice of the underrepresented, and being the central coordinator of efforts. It is not an easy role to play, but a vital one for families and communities.

<b>Standard 2.1   Private</b>	The organization has documented or demonstrated partnerships across the community, for specifically identified purposes; partnerships include other anti-poverty organizations in the area.
<b>Standard 2.1   Public</b>	The department has documented or demonstrated partnerships across the community, for specifically identified purposes; partnerships include other anti-poverty organizations in the area.
<b>Standard 2.2   Private</b>	The organization utilizes information gathered from key sectors of the community in assessing needs and resources, during the community assessment process or other times. These sectors would include at minimum: community-based organizations, faith-based organizations, private sector, public sector, and educational institutions.
<b>Standard 2.2   Public</b>	The department utilizes information gathered from key sectors of the community in assessing needs and resources, during the community assessment process or other times. These sectors would include at minimum: community-based organizations, faith-based organizations, private sector, public sector, and educational institutions.
<b>Standard 2.3   Private</b>	The organization communicates its activities and its results to the community.
<b>Standard 2.3   Public</b>	The department communicates its activities and its results to the community.
<b>Standard 2.4   Private</b>	The organization documents the number of volunteers and hours mobilized in support of its activities.
<b>Standard 2.4   Public</b>	The department documents the number of volunteers and hours mobilized in support of its activities.

## CATEGORY THREE: Community Assessment

Local control of Federal CSBG resources is predicated on regular comprehensive community assessments that take into account the breadth of community needs as well as the partners and resources available in a community to meet these needs. Regular assessment of needs and resources at the community level is the foundation of Community Action and a vital management and leadership tool that is used across the organization and utilized by the community to set the course for both CSBG and all agency resources.

<b>Standard 3.1   Private</b>	The organization conducted a community assessment and issued a report within the past 3 years.
<b>Standard 3.1   Public</b>	The department conducted or was engaged in a community assessment and issued a report within the past 3 years, if no other report exists.
<b>Standard 3.2   Private</b>	As part of the community assessment, the organization collects and includes current data specific to poverty and its prevalence related to gender, age, and race/ethnicity for their service area(s).
<b>Standard 3.2   Public</b>	As part of the community assessment, the department collects and includes current data specific to poverty and its prevalence related to gender, age, and race/ethnicity for their service area(s).
<b>Standard 3.3   Private</b>	The organization collects and analyzes both qualitative and quantitative data on its geographic service area(s) in the community assessment.
<b>Standard 3.3   Public</b>	The department collects and analyzes both qualitative and quantitative data on its geographic service area(s) in the community assessment.
<b>Standard 3.4   Private</b>	The community assessment includes key findings on the causes and conditions of poverty and the needs of the communities assessed.
<b>Standard 3.4   Public</b>	The community assessment includes key findings on the causes and conditions of poverty and the needs of the communities assessed.
<b>Standard 3.5   Private</b>	The governing board formally accepts the completed community assessment.
<b>Standard 3.5   Public</b>	The tripartite board/advisory body formally accepts the completed community assessment.

# VISION AND DIRECTION

## CATEGORY FOUR: Organizational Leadership

Community Action leadership is exemplified at all levels across the organization and starts with a mission that clarifies Community Action's work on poverty. A well-functioning board, and a focused chief executive officer (CEO)/executive director, well-trained and dedicated staff, and volunteers giving of themselves to help others will establish Community Action as the cornerstone and leverage point to address poverty across the community. Ensuring strong leadership both for today and into the future is critical.

This category addresses the foundational elements of mission as well as the implementation of the Network's model of good performance management (ROMA). It ensures CAAs have taken steps to plan thoughtfully for today's work and tomorrow's leadership.

**Standard 4.1 | Private** The governing board has reviewed the organization's mission statement within the past 5 years and assured that:

1. The mission addresses poverty; and
2. The organization's programs and services are in alignment with the mission.

**Standard 4.1 | Public** The tripartite board/advisory body has reviewed the department's mission statement within the past 5 years and assured that:

1. The mission addresses poverty; and
2. The CSBG programs and services are in alignment with the mission.

**Standard 4.2 | Private** The organization's Community Action plan is outcome-based, anti-poverty focused, and ties directly to the community assessment.

**Standard 4.2 | Public** The department's Community Action plan is outcome-based, anti-poverty focused, and ties directly to the community assessment.

**Standard 4.3 | Private** The organization's Community Action plan and strategic plan document the continuous use of the full Results Oriented Management and Accountability (ROMA) cycle or comparable system (assessment, planning, implementation, achievement of results, and evaluation). In addition, the organization documents having used the services of a ROMA-certified trainer (or equivalent) to assist in implementation.

**Standard 4.3 | Public** The department's Community Action plan and strategic plan document the continuous use of the full Result Oriented Management and Accountability (ROMA) cycle or comparable system (assessment, planning, implementation, achievement of results, and evaluation). In addition, the department documents having used the services of a ROMA-certified trainer (or equivalent) to assist in implementation.

**Standard 4.4 | Private** The governing board receives an annual update on the success of specific strategies included in the Community Action plan.

**Standard 4.4 | Public** The tripartite board/advisory body receives an annual update on the success of

specific strategies included in the Community Action plan.

**Standard 4.5 | Private** The organization has a written succession plan in place for the CEO/ED, approved by the governing board, which contains procedures for covering an emergency/unplanned, short-term absence of 3 months or less, as well as outlines the process for filling a permanent vacancy.

**Standard 4.5 | Public** The department adheres to its local government's policies and procedures around interim appointments and processes for filling a permanent vacancy.

**Standard 4.6 | Private** An organization-wide, comprehensive risk assessment has been completed within the past 2 years and reported to the governing board.

**Standard 4.6 | Public** The department complies with its local government's risk assessment policies and procedures.

## CATEGORY FIVE: Board Governance

Community Action boards are uniquely structured to ensure maximum feasible participation by the entire community, including those the network serves. By law, Community Action boards are comprised of at least 1/3 low-income consumers (or their representatives), 1/3 elected officials (or their appointees), and the remainder private-sector community members. To make this structure work as intended, CAAs must recruit board members thoughtfully, work within communities to promote opportunities for board service, and orient, train, and support them in their oversight role. Boards are foundational to good organizational performance and the time invested to keep them healthy and active is significant, but necessary.

**Standard 5.1 | Private** The organization's governing board is structured in compliance with the CSBG Act:

1. At least one third democratically-selected representatives of the low-income community;
2. One-third local elected officials (or their representatives); and
3. The remaining membership from major groups and interests in the community.

**Standard 5.1 | Public** The department's tripartite board/advisory body is structured in compliance with the CSBG Act, by either:

1. Selecting the board members as follows:
  - At least one third are democratically-selected representatives of the low-income community;
  - One-third are local elected officials (or their representatives); and
  - The remaining members are from major groups and interests in the community; or
2. Selecting the board through another mechanism specified by the State to assure decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs.

**Standard 5.2 | Private** The organization's governing board has written procedures that document a democratic selection process for low-income board members adequate to assure that they are representative of the low-income community.

**Standard 5.2 | Public** The department's tripartite board/advisory body either has:

1. Written procedures that document a democratic selection process for low-income board members adequate to assure that they are representative of the low-income community, or
2. Another mechanism specified by the State to assure decision-making and participation by low-income individuals in the development, planning, implementation, and evaluation of programs.

*Please note under IM 82 for Public Entities the law also requires that a minimum of 1/3 of tripartite board membership be comprised of representatives of low-income individuals and families who reside in areas served.*

<b>Standard 5.3   Private</b>	The organization's bylaws have been reviewed by an attorney within the past 5 years.
<b>Standard 5.3   Public</b>	Not applicable: Review of bylaws by an attorney is outside of the purview of the department and the tripartite board/advisory body, therefore this standard does not apply to public entities.
<b>Standard 5.4   Private</b>	The organization documents that each governing board member has received a copy of the bylaws within the past 2 years.
<b>Standard 5.4   Public</b>	The department documents that each tripartite board/advisory body member has received a copy of the governing documents, within the past 2 years.
<b>Standard 5.5   Private</b>	The organization's governing board meets in accordance with the frequency and quorum requirements and fills board vacancies as set out in its bylaws.
<b>Standard 5.5   Public</b>	The department's tripartite board/advisory body meets in accordance with the frequency and quorum requirements and fills board vacancies as set out in its governing documents.
<b>Standard 5.6   Private</b>	Each governing board member has signed a conflict of interest policy within the past 2 years.
<b>Standard 5.6   Public</b>	Each tripartite board/advisory body member has signed a conflict of interest policy, or comparable local government document, within the past 2 years.
<b>Standard 5.7   Private</b>	The organization has a process to provide a structured orientation for governing board members within 6 months of being seated.
<b>Standard 5.7   Public</b>	The department has a process to provide a structured orientation for tripartite board/advisory body members within 6 months of being seated.
<b>Standard 5.8   Private</b>	Governing board members have been provided with training on their duties and responsibilities within the past 2 years.
<b>Standard 5.8   Public</b>	Tripartite board/advisory body members have been provided with training on their duties and responsibilities within the past 2 years.
<b>Standard 5.9   Private</b>	The organization's governing board receives programmatic reports at each regular board meeting.
<b>Standard 5.9   Public</b>	The department's tripartite board/advisory body receives programmatic reports at each regular board/advisory meeting.

## CATEGORY SIX: Strategic Planning

Establishing the vision for a Community Action Agency is a big task and setting the course to reach it through strategic planning is serious business. CSBG eligible entities take on this task by looking both at internal functioning and at the community's needs. An efficient organization knows where it is headed, how the board and staff fit into that future, and how it will measure its success in achieving what it has set out to do. This agency-wide process is board-led and ongoing. A "living, breathing" strategic plan with measurable outcomes is the goal, rather than a plan that gets written but sits on a shelf and stagnates. Often set with an ambitious vision, strategic plans set the tone for the staff and board and are a key leadership and management tool for the organization.

<b>Standard 6.1   Private</b>	The organization has an agency-wide strategic plan in place that has been approved by the governing board within the past 5 years.
<b>Standard 6.1   Public</b>	The department has a strategic plan, or comparable planning document, in place that has been reviewed and accepted by the tripartite board/advisory body within the past 5 years. If the department does not have a plan, the tripartite board/advisory body will develop the plan.
<b>Standard 6.2   Private</b>	The approved strategic plan addresses reduction of poverty, revitalization of low-income communities, and/or empowerment of people with low incomes to become more self-sufficient.
<b>Standard 6.2   Public</b>	The approved strategic plan, or comparable planning document, addresses reduction of poverty, revitalization of low-income communities, and/or empowerment of people with low incomes to become more self-sufficient.
<b>Standard 6.3   Private</b>	The approved strategic plan contains family, agency, and/or community goals.
<b>Standard 6.3   Public</b>	The approved strategic plan, or comparable planning document, contains family, agency, and/or community goals.
<b>Standard 6.4   Private</b>	Customer satisfaction data and customer input, collected as part of the community assessment, is included in the strategic planning process.
<b>Standard 6.4   Public</b>	Customer satisfaction data and customer input, collected as part of the community assessment, is included in the strategic planning process, or comparable planning process.
<b>Standard 6.5   Private</b>	The governing board has received an update(s) on progress meeting the goals of the strategic plan within the past 12 months.
<b>Standard 6.5   Public</b>	The tripartite board/advisory body has received an update(s) on progress meeting the goals of the strategic plan/comparable planning document within the past 12 months.

## OPERATIONS AND ACCOUNTABILITY

### CATEGORY SEVEN: Human Resource Management

The human element of Community Action's work is evident at all levels of the organization and the relationship an organization has with its staff often reflects the organization's values and mission. Oversight of the chief executive officer (CEO)/executive director and maintaining a strong human resources infrastructure are key responsibilities of board oversight. Attention to organizational elements such as policies and procedures, performance appraisals, and training lead to strong organizations with the capacity to deliver high quality services in low-income communities.

**Standard 7.1 | Private** The organization has written personnel policies that have been reviewed by an attorney and approved by the governing board within the past 5 years.

**Standard 7.1 | Public** Not applicable: Local governmental personnel policies are outside of the purview of the department and the tripartite board/ advisory body, therefore this standard does not apply to public entities.

**Standard 7.2 | Private** The organization makes available the employee handbook (or personnel policies in cases without a handbook) to all staff and notifies staff of any changes.

**Standard 7.2 | Public** The department follows local governmental policies in making available the employee handbook (or personnel policies in cases without a handbook) to all staff and in notifying staff of any changes.

**Standard 7.3 | Private** The organization has written job descriptions for all positions, which have been updated within the past 5 years.

**Standard 7.3 | Public** The department has written job descriptions for all positions. Updates may be outside of the purview of the department.

**Standard 7.4 | Private** The governing board conducts a performance appraisal of the CEO/executive director within each calendar year.

**Standard 7.4 | Public** The department follows local government procedures for performance appraisal of the department head.

**Standard 7.5 | Private** The governing board reviews and approves CEO/executive director compensation within every calendar year.

**Standard 7.5 | Public** The compensation of the department head is made available according to local government procedure.

**Standard 7.6 | Private** The organization has a policy in place for regular written evaluation of employees by their supervisors.

**Standard 7.6 | Public** The department follows local governmental policies for regular written evaluation of employees by their supervisors.

<b>Standard 7.7   Private</b>	The organization has a whistleblower policy that has been approved by the governing board.
<b>Standard 7.7   Public</b>	The department provides a copy of any existing local government whistleblower policy to members of the tripartite board/advisory body at the time of orientation.
<b>Standard 7.8   Private</b>	All staff participate in a new employee orientation within 60 days of hire.
<b>Standard 7.8   Public</b>	The department follows local governmental policies for new employee orientation.
<b>Standard 7.9   Private</b>	The organization conducts or makes available staff development/training (including ROMA) on an ongoing basis.
<b>Standard 7.9   Public</b>	The department conducts or makes available staff development/training (including ROMA) on an ongoing basis.

## CATEGORY EIGHT: Financial Operations and Oversight

The fiscal bottom line of Community Action is not isolated from the mission, it is a joint consideration. Community Action boards and staff maintain a high level of fiscal accountability through audits, monitoring by State and Federal agencies, and compliance with Federal Office of Management Budget circulars. The management of Federal funds is taken seriously by CSBG eligible entities and the Standards specifically reflect the board's oversight role as well as the day-to-day operational functions.

**Standard 8.1 | Private** The Organization's annual audit (or audited financial statements) is completed by a Certified Public Accountant on time in accordance with Title 2 of the Code of Federal Regulations, Uniform Administration Requirements, Cost Principles, and Audit Requirement (if applicable) and/or State audit threshold requirements.

**Standard 8.1 | Public** The department's annual audit is completed through the local governmental process in accordance with Title 2 of the Code of Federal Regulations, Uniform Administrative Requirements, Cost Principles, and Audit Requirement (if applicable) and/or State audit threshold requirements. This may be included in the municipal entity's full audit.

**Standard 8.2 | Private** All findings from the prior year's annual audit have been assessed by the organization and addressed where the governing board has deemed it appropriate.

**Standard 8.2 | Public** The department follows local government procedures in addressing any audit findings related to CSBG funding.

**Standard 8.3 | Private** The organization's auditor presents the audit to the governing board.

**Standard 8.3 | Public** The department's tripartite board/advisory body is notified of the availability of the local government audit.

**Standard 8.4 | Private** The governing board formally receives and accepts the audit.

**Standard 8.4 | Public** The department's tripartite board/advisory body is notified of any findings related to CSBG funding.

**Standard 8.5 | Private** The organization has solicited bids for its audit within the past 5 years.

**Standard 8.5 | Public** Not applicable: The audit bid process is outside of the purview of tripartite board/advisory body therefore this standard does not apply to public entities.

**Standard 8.6 | Private** The IRS Form 990 is completed annually and made available to the governing board for review.

**Standard 8.6 | Public** Not applicable: The Federal tax reporting process for local governments is outside of the purview of tripartite board/advisory body therefore this standard does not apply to public entities.

<b>Standard 8.7</b>   Private	The governing board receives financial reports at each regular meeting that include the following: 1. Organization-wide report on revenue and expenditures that compares budget to actual, categorized by program; and 2. Balance sheet/statement of financial position.
<b>Standard 8.7</b>   Public	The tripartite board/advisory body receives financial reports at each regular meeting, for those program(s) the body advises, as allowed by local government procedure.
<b>Standard 8.8</b>   Private	All required filings and payments related to payroll withholdings are completed on time.
<b>Standard 8.8</b>   Public	Not applicable: The payroll withholding process for local governments is outside of the purview of the department, therefore this standard does not apply to public entities.
<b>Standard 8.9</b>   Private	The governing board annually approves an organization-wide budget.
<b>Standard 8.9</b>   Public	The tripartite board/advisory body has input as allowed by local governmental procedure into the CSBG budget process.
<b>Standard 8.10</b>   Private	The fiscal policies have been reviewed by staff within the past 2 years, updated as necessary, with changes approved by the governing board.
<b>Standard 8.10</b>   Public	Not applicable: The fiscal policies for local governments are outside of the purview of the department and the tripartite board/advisory body, therefore this standard does not apply to public entities.
<b>Standard 8.11</b>   Private	A written procurement policy is in place and has been reviewed by the governing board within the past 5 years.
<b>Standard 8.11</b>   Public	Not applicable: Local governmental procurement policies are outside of the purview of the department and the tripartite board/advisory body, therefore this standard does not apply to public entities.
<b>Standard 8.12</b>   Private	The organization documents how it allocates shared costs through an indirect cost rate or through a written cost allocation plan.
<b>Standard 8.12</b>   Public	Not applicable: A written cost allocation plan is outside of the purview of the department and the tripartite board/advisory body, therefore this standard does not apply to public entities.
<b>Standard 8.13</b>   Private	The organization has a written policy in place for record retention and destruction.
<b>Standard 8.13</b>   Public	The department follows local governmental policies for document retention and destruction.

## CATEGORY NINE: Data and Analysis

The Community Action Network moves families out of poverty every day across this country and needs to produce data that reflect the collective impact of these efforts. Individual stories are compelling when combined with quantitative data: *no data without stories and no stories without data*. Community Action needs to better document the outcomes families, agencies, and communities achieve. The Community Services Block Grant funding confers the obligation and opportunity to tell the story of agency-wide impact and community change, and in turn the impact of the Network as a whole.

<b>Standard 9.1   Private</b>	The organization has a system or systems in place to track and report client demographics and services customers receive.
<b>Standard 9.1   Public</b>	The department has a system or systems in place to track and report client demographics and services customers receive.
<b>Standard 9.2   Private</b>	The organization has a system or systems in place to track family, agency, and/or community outcomes.
<b>Standard 9.2   Public</b>	The department has a system or systems in place to track family, agency, and/or community outcomes.
<b>Standard 9.3   Private</b>	The organization has presented to the governing board for review or action, at least within the past 12 months, an analysis of the agency's outcomes and any operational or strategic program adjustments and improvements identified as necessary.
<b>Standard 9.3   Public</b>	The department has presented to the tripartite board/advisory body for review or action, at least within the past 12 months, an analysis of the agency's outcomes and any operational or strategic program adjustments and improvements identified as necessary.
<b>Standard 9.4   Private</b>	The organization submits its annual CSBG Information Survey data report and it reflects client demographics and organization-wide outcomes.
<b>Standard 9.4   Public</b>	The department submits its annual CSBG Information Survey data report and it reflects client demographics and CSBG-funded outcomes.



TOOLKIT

# RISK ASSESSMENT TOOLKIT

**Quick Reference  
Guide to Risk  
Assessment Basics  
for Community  
Action Agencies**



# RISK ASSESSMENT TOOLKIT

## Quick Reference Guide to Risk Assessment Basics for Community Action Agencies

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# INTRODUCTION

*This is a toolkit designed to be a quick reference guide for the foundational elements of risk assessment. It is based on IM-112 which outlines standards to be used in risk assessment. These standards frame the discussion and are the basis of the ACF/OCS perspective of the subject.*

## Risk Assessment Foundations

### 1. What is IM 112?

Information Memorandum 112 is guidance issued on August 18, 2009, by the Office of Community Services, a program of the Administration for Children and Families of the U.S. Department of Health and Human Services. The Office of Community Services (OCS) utilizes Information Memorandums (IM) to provide guidance to recipients and sub-recipients of federal funds for which OCS is responsible. The full text of IM 112 is available at <http://www.acf.hhs.gov/programs/ocs/csbg/guidance/im112.html>.

IM 112 was issued to address specific concerns regarding the management of funds made available through the American Recovery and Reinvestment Act of 2009, the federal stimulus dollars frequently referred to by the acronym ARRA. In addition to providing guidance relating to ARRA funding, IM 112 required all CSBG eligible entities to conduct a risk assessment process and to certify that their risk assessment process addressed specific factors identified in the IM. **While the impetus for IM 112 was the provision of ARRA funding, the core risk assessment and risk mitigation strategies expressed in IM 112 continue to be required of all CSBG funding recipients.**

### 2. What is ARRA?

The American Recovery and Reinvestment Act of 2009 (ARRA) provided funding to States, U.S. Territories, and eligible Tribal governments and Tribal Organizations based on a defined formula outlined in Public Law 105-285, the Community Opportunities, Accountability and Training and Educational Services Act of the 1998. Additional guidance regarding ARRA funding was provided by the Office of Community Services in IM 109 and 110.

### 3. Does IM 112 still apply even after all of our ARRA awards are closed?

Yes! While IM 112 discusses ARRA funding explicitly, the compliance guidance it provides applies to the management of virtually all federal funding agreements, including ongoing CSBG funding awards. Both before and after ARRA, recipients of federal funds have been required to comply with the OMB Circular A-110 (2 CFR 215) by implementing financial management systems which provide “effective control over and accountability for all funds, property and other assets” (2 CFR 215.21.b.3).

The GAO Standards for Internal Control (<http://www.gao.gov/special.pubs/ai00021p.pdf>) and the COSO Integrated Internal Control Framework (<http://www.coso.org/IC-IntegratedFramework-summary.htm>) referenced in IM 112 comprise the most widely accepted approach to establish financial management systems which provide the effective controls required by A-110. The importance of the COSO framework for internal control in the management of federal funds is further reinforced by the OMB A-133 and its compliance supplements which direct auditors to use the COSO framework as the basis of their audit planning and evaluation of internal controls.

### 4. Do CAAs Need to Continue Doing the Certification of Risk Assessment that was required in IM 112?

IM 112 included a requirement for CAAs to certify the completion of a risk assessment process expressly designed to address risks specific to the management of ARRA funding. The Sample Risk Assessment Template included in IM 112 posed risk assessment questions which continue to be useful in the overall risk assessment process. This is a key element in establishing and maintaining the controls needed for the management of all federal awards.

The IM 112 Risk Assessment Template required Community Action Boards to determine whether their CAA had:

1. Identified and resolved prior audit and monitoring findings;
2. Implemented financial and operational controls to prevent fraud, waste, abuse, and mismanagement of federal funds;
3. Established administrative, fiscal, and programmatic policies and procedures in accord with CSBG statutes which are communicated clearly to all staff;
4. Reviewed internal policies and procedures for compliance with the requirements of the CSBG Act, CSBG Information Memorandum, OMB Circulars, ACF Grant Terms and Conditions, and other contracted terms and conditions and implemented a methodology for monitoring internal policies and procedures;
5. Reviewed procedures to ensure compliance with CSBG ARRA provisions relating to purchase of general purpose equipment;
6. Requested Federal waivers when required to comply with CSBG Statutes relating to the purchase or improvement of land, or the purchase, construction, or permanent improvement of buildings or facilities.

While OCS does not currently require Community Action Agencies to complete a similar risk assessment certification, CAAs will want to be sure that they continue to determine whether their organization has addressed the issues identified in questions 1 through 4 and question 6 as part of their comprehensive risk assessment process, and address the underlying issue posed in question 5 (which was ARRA specific) to encompass the specific requirements of their current funding agreements in relation to purchase of general purpose equipment.

#### 5. Does IM 112 require a specific approach to internal controls?

IM 112 notes that CSBG recipient organizations are required to have comprehensive internal controls. IM 112 quotes the definition of internal control provided by the Government Accountability Office “internal control is not one event, but a series of actions and activities that occur throughout an entity’s operations and on an ongoing basis. Internal control should be recognized as an integral part of each system that management uses to guide its operations rather than as a separate system within an agency” (GAO/AIMD-00-21.5.1, Standards for Internal Control in the Federal Government). GAO standards for internal control in the Federal Government are available online at <http://www.gao.gov/special.pubs/ai00021p.pdf>.

IM 112 notes that the basis for the GAO standards is found in **The Internal Control Integrated Framework**, published by the **Committee of Sponsoring Organizations of the Treadway Commission (COSO)**. The approach to risk assessment and evaluation of internal controls required by IM 112 is based upon to core tenants of the COSO Integrated Framework.

## What is the COSO Internal Control Integrated Framework?

COSO is an acronym for the Committee of Sponsoring Organizations of the Treadway Commission. The Committee included representatives from five major professional organizations headquartered in the United States who came together in 1985 to develop comprehensive guidance for establishing internal controls which would protect all types of entities from error and fraud. The resulting document –Internal Control–Integrated Framework–was released in 1992. In 2010, COSO announced a project to update the 1992 document. The updating effort will include specific attention to the challenges of nonprofit organizations.

A summary of The Internal Control Integrated Framework may be downloaded free from <http://www.coso.org/IC-IntegratedFramework-summary.htm>. The entire framework document may be purchased from the same website –however most Community Action Agencies will find the summary meets their needs. The integrated framework identifies 5 key elements of effective systems of internal controls. You'll find help with each of these elements in the FAQs indicated below:

- Risk Assessment – Section IV
- Control Environment – Section V
- Control activities– Section VI
- Information and Effective Communication – Section VII
- Monitoring– Section VIII

The COSO framework provides core guidance for independent auditors as well as Boards and managers. It is utilized by auditors to gain an understanding of auditees' systems of internal controls which will be the basis for the audit plan, design of audit tests, and ultimately findings regarding the adequacy of internal controls.

## **Preventing Fraud, Waste, and Abuse**

### **6. What kinds of fraud happen in CAAs?**

The term “fraud” encompasses three key areas:

- Misappropriation – theft or misuse for personal gain of goods or services
- Misstatement – asserting that information is true, accurate, and complete when it is not
- Corruption– decisions or actions that benefit individuals or other entities but are not in the best interest of the CAA

Unfortunately, all three types of fraud can occur in Community Action Agencies as well as every other type of business or governmental entity. Internal Controls are designed to prevent and detect all types of errors or irregularities, including the types of activities which can be described as controls.

### **7. What types of misappropriation do CAAs experience?**

Unfortunately, virtually all types of theft or misuse are possible. Community Action Agencies must design and implement controls to protect themselves from dishonest acts by both insiders (staff, volunteers, clients, board members) and outsiders (visitors, internet fraudsters, and common thieves). Embezzlement schemes may involve redirection of contributions and other payments intended for the CAA to the accounts of thieves, or various strategies to trick the system into making payments for goods and services not received. Today's computers and printers make it easy for fraudsters to attach the CAA's bank routing information to fake checks which can be cashed with fake IDs. Because new strategies for embezzlement emerge daily, CAAs must continuously monitor their controls to be sure that they designed and implemented effectively to meet emerging risks.

Misuse of the CAA's assets is also a form of misappropriation. Employees or volunteers who “borrow” the use of vehicles or equipment to use for personal purposes may not understand that they are actually committing a form of fraud. Managers or Board members who ask employees to “help out” with personal projects may end up “stealing” services from the organization. The misuse of corporate assets (including staff time as well as equipment) is best prevented by clear policies, strong role models, and whistleblower procedures which encourage everyone associated with the CAA to share information through appropriate channels when they encounter situations that they believe may comprise misuse of assets.

### **8. What is misstatement and why does it matter?**

The fraud of misstatement occurs when an organization asserts that a statement is true when, in fact, it isn't. Potential opportunities for misstatement include both financial and program reporting, especially reporting to funding sources relating to compliance with requirements

referenced in contracts and agreements. Typically, funding source report formats include a statement affirming the accuracy and completeness of the data contained in the report and compliance with law and regulation described in the funding agreement. Unfortunately, weak controls and limited internal monitoring systems may result in managers signing such affirmations in the belief that the organization has complied with the requirements when in fact breakdowns in communications and controls have resulted in failure to comply.

The preparation of financial statements almost always involves some level of professional judgment and reliance on certain estimates and assumptions. Misstatement occurs if the resulting financial information presents a materially misleading picture of financial activities and results. In a grant funded environment, improper coding of costs to the various funding source agreements may result in misstatement – asserting that grant funds have been expended only for allowable purposes when in fact, unallowable costs, including improperly allocated costs, have been included in the report.

Misstatements may lead to audit findings and eventual demands for repayment of funds or exclusion from future funding opportunities. Equally important, misstatement results in both managers and board members making decisions based on faulty information.

## **9. What is corruption?**

Corruption occurs when someone with a decision-making role is induced to make a decision which is not in the best interests of the organization. For example, a vendor who makes gifts to a manager with responsibility for purchasing program supplies is engaging in corruption. Similarly, a Board member who influences a manager's decision on the selection of staff to gain preference for a friend or relative is engaging in corruption. Community Action Agencies regularly utilize Conflict of Interest Policies as part of an overall system to prevent corruption and Whistleblower Policies and Procedures to encourage reporting of concerns about improper conduct.

## **10. What can Boards do to prevent fraud, waste, and abuse?**

Board attention to the control environment is essential to prevent fraud, waste, and abuse. Board members must hold each other to the highest standards of integrity, adopting and fully implementing conflict of interest policies, and regularly reviewing the Board's own performance in relation to effective oversight of the Executive Director (ED), finances, and compliance. Boards delegate substantial responsibility for preventing fraud, waste, and abuse to the Executive Directors and must consistently monitor and evaluate the adequacy of their ED's performance in these key areas. The annual independent audit provides a great opportunity for Board members to get help understanding how well their controls are working from an independent professional. To make the most of this opportunity, Boards need to ensure that either the Audit Committee or full Board conducts a confidential meeting with the auditor at the close of the audit engagement to seek the auditor's observations about controls and the control environment and recommendations for improvements.

# **Risk Assessment**

## **11. What is Risk Assessment?**

Risk assessment is a systematic process of thinking through the many ways that "bad things can happen to good people". Starting from the understanding that every organization intends to do the right thing, from board governance to financial management and the delivery of services, real life experience tells us that things don't always turn out the way we intend to have them turn out. Risk assessment involves identifying the areas in which problems might arise and then systematically evaluating both how likely that each problem is to occur and how serious the consequences of the problem would be. The goal of risk assessment is to understand the risks that our organization confronts and clarify the extent to which we can undertake strategies (risk mitigation) to control the likelihood of occurrence and the severity of the consequences.

## **12. How can my Board be sure our Community Action Agency has done an effective risk assessment?**

Some CAAs establish a Risk Management Committee comprised of Board members and other community members with extensive risk management expertise. Larger businesses, hospitals and health systems, and governmental organizations will be good sources of potential committee members with risk management expertise. The Risk Management Committee can review the risk assessment developed by management and determine whether areas have been missed or minimized. Risk Management Committees also work with management to review the risk mitigation strategies that management has designed and implemented. The committee can then report to the Board to identify any areas that require additional attention or provide assurance that management's risk assessment and risk mitigation approach is sound.

Boards may also consider using independent experts to perform risk assessments and recommend risk mitigation strategies in specific areas or agency-wide. The independent auditor will have reviewed management's risk assessment and risk mitigation strategies in relation to internal controls, so Board conversations with the auditor should include discussion of the adequacy of management's approach to risk. Boards may include a request for risk assessment as part of the responses required from insurance brokers who wish to be considered to work with the CAA. Attorneys with specialized expertise in nonprofit law often provide a form of risk assessment through reviewing the CAA's core legal documents (articles of incorporation, by-laws), board policies and board minutes to provide recommendations about governance risks. Attorneys focusing on employment law and/or human resources consultants may be engaged to review the CAA's employment policies and practices to identify areas of risk and mitigation strategies.

Ultimately, each Board will want to develop a process for identifying risks and evaluating the risk mitigation strategies that the organization has developed to control the risk. Ensuring effective risk assessment and risk mitigation is a core oversight responsibility for every Board. This relates directly to the Board's legal responsibility to protect the assets of the nonprofit and to ensure that all resources are used wisely in the best interest of the corporation.

## **13. How can representatives of low income communities make an important contribution to risk assessment?**

Low income individuals can make tremendously important contributions to risk assessment by sharing their knowledge of how individuals and organizations within low income communities perceive the work of the CAA. By listening to friends, neighbors, and family members, the low income representatives have access to vital information for risk assessment, including:

- Is information about the services of the CAA widely available to average community members?
- Do community members who have sought help through the CAA feel that they have been treated respectfully and fairly?
- Does the information that the CAA provides to individuals and to community organizations make the nature of the services and the requirements for eligibility clear to an average person who is not already knowledgeable about a specific government program?
- Do people in the community perceive the staff of the CAA to be honest?
- Do people in the community perceive that CAA programs are "safe"? If vulnerable people are being served, like children, seniors, or people with disabilities, do community members perceive them to be protected from harm?
- Do you hear suggestions about how to "beat the system" in relation to the CAA?

To get the benefit of the knowledge and insight of low income representatives on the board, the CAA will need to provide an opportunity for confidential communication with the Board committee that is reviewing the organization's risk assessment. While managers generally perform the initial assessment, the Board has a key role in reviewing the work of management

to be sure that risks have been identified clearly. If the observations of the low income community representatives suggest risks that have not been addressed, the Board will need to ask management to determine whether the perceptions reflect reality or whether the underlying issue is really reputation risk – that is the risk that the reputation of the CAA will be damaged by unfair as well as fair perceptions about the competence and integrity of the CAA.

#### **14. How does the size of the CAA impact the Board’s role in risk assessment and risk management?**

Effective risk assessment and risk management requires both substantial skill and time. Larger CAAs frequently have sufficient resources to hire top managers with both extensive professional preparation and sufficient time to focus on risk assessment and risk management rather than multiple daily operational tasks. For example, a larger CAA may employ a Chief Financial Officer who is qualified as a CPA and has extensive experience utilizing the COSO framework as an auditor, and is supported by a staff of knowledgeable accounts including a Controller who handles the complex demands of overseeing the accounting system and preparing financial statements. In this structure, the Chief Financial Officer (CFO) has both the time and the expertise required to lead a risk assessment process and may even be able to supervise multiple staff with responsibilities for risk management.

In large organizations in which professional staff have both time and expertise to provide effective leadership in risk assessment and risk mitigation, the Board role often focuses on evaluating the performance of management in these areas. Such Boards frequently utilize committees to address specific components of risk assessment and management including establishing an Audit Committee, Risk Management Committee, Chief Executive Officer (CEO) Compensation Committee, and charging the Executive Committee with particular responsibility for oversight and support of the CEO.

In contrast, in many small and mid-sized CAAs, the person with the CFO or Fiscal Director title is actually fulfilling the role described for the Controller in the larger organization, overseeing the accounting system on a daily basis and preparing financial statements and a variety of funding source reports. So regardless of professional preparation, the fiscal director in the smaller organization may simply not have the time available to lead a comprehensive risk assessment and risk management effort.

In small to mid-sized CAAs, Board members or a Board committee may need to provide leadership in risk assessment and risk management, bringing both professional expertise and mental space to reflecting on the COSO framework within their organization. In some small to mid-sized CAAs, Board members do not have the professional expertise or time required to provide leadership in utilizing the COSO framework, and instead direct the use of resources to obtain professional consulting services for periodic evaluation of risks and risk mitigation strategies.

But regardless of the size of the CAA, Boards have a critical role to play in relation to establishing effective controls by expressing absolute commitment to integrity at every level of the organization and providing resources to ensure that professional expertise is available to ensure both the design and the consistent implementation of cost effective internal controls.

## **Control Environment**

#### **15. What does control environment mean?**

The “control environment” refers to the extent to which everyone who has contact with an organization perceives the organization and its leaders to be committed to complete integrity in every aspect of their work. While the presence of policies and procedures which require honesty is an element of the control environment, the actual behavior and attitude of leaders may have a more significant impact on behaviors within an organization. The Board plays a critical role in both establishing a positive control environment and continuously evaluating the control environment which exists within the organization they serve.

## **16. How can Boards know what the control environment in their CAA really is?**

Boards can draw first on their own experiences with the organization, considering the extent to which the Board is demonstrating its commitment to honesty and integrity through its actions as well as words. Board members can reflect upon their experiences with the Executive Director and other staff to understand the extent to which questions raised by the board have been answered fully and information presented to the board has been complete, accurate, and useful. Boards can also reflect on the degree to which their annual performance evaluation of the CEO has provided them with a clear understanding of the person's behaviors in relation to integrity issues.

Board-only discussions with the independent auditor provide an excellent opportunity for the Board to explore the auditor's perceptions regarding the control environment. Board review of reports from funding source monitors may also provide useful information regarding control environment strengths and weaknesses. Whistleblower policies and procedures should be designed to ensure that concerns about integrity and compliance with control procedures are brought to the attention of the Board.

Some Boards form a Risk Management Committee and assign the committee responsibility for evaluating the control environment annually through review of policies and procedures and through interviews with the CEO and key managers. Risk Management Committees may augment the information they receive through these procedures with periodic employee surveys designed to measure employee perception regarding organizational integrity a management attitudes around control issues. Some organizations utilize consultants to conduct exit interviews of some or all departing employees to obtain insight into the actual work environment within the organization.

Board members who are representing low income communities may play a particularly valuable role in building the Board's understanding of the control environment through their direct knowledge of how the organization is perceived by its clients or prospective clients. Risk Management Committee confidential interviews with low income representatives can surface community perceptions of integrity or lack of integrity which can be extremely helpful in building the Board's understanding of the control environment.

## **17. What is the Board's role in creating and maintaining a positive Control Environment?**

The Board sets the tone for the control environment through its selection and oversight of the Executive Director/CEO and through its commitment to attentive, engaged direction of the organization. Maintaining a positive control environment requires regular Board attention for full implementation of the Conflict of Interest policy and meaningful evaluation of the CEO. Boards can reinforce their commitment to integrity and control through contracting with the auditor or other professional resources to review CEO expense reports and executive compensation and benefits. Board or Audit Committee confidential conversations with the independent auditor also provide an important opportunity for understanding the control environment and identifying strategies to strengthen it.

Boards must be committed to following up on any concerns about integrity which may arise through informal as well as formal channels. Some Boards require the use of third party reporting services for whistleblower reporting purposes in order to get expert assistance to follow-up on control concerns.

## **Control Activities**

### **18. What are Control Activities?**

Control activities are the systems, policies, and procedures that CAAs put in place to ensure effective financial management which protects assets and prevents fraud, waste, and abuse. They include fiscal, information technology, human resource, facilities, program, and board policies and procedures designed to prevent improper actions and errors from occurring and detect mistakes (willful or accidental) and ensure correction.

## 19. What is the Board's role in Control Activities?

Boards most commonly play primarily authorizing and review roles within the organization's overall system of controls. Board approval of the annual budget and authorization of overall CEO/Executive Director compensation are critical control activities. Board review of actual revenues and expenses in comparison to the budget also functions as a control activity, facilitating identification of both potential accounting errors and possible misdirection of resources.

However, given the size, scope, and complexity of operations in most Community Action Agencies, management must take primary responsibility for Control Activities, including the design of control systems, full implementation of the systems, and regular monitoring of internal compliance.

Some control systems utilize Board signatures on checks as a key control activity. As organizations grow more complex, the volume of transactions expands, and the use of electronic payment methods increases, the efficacy of Board signatures on checks as a key control activity becomes less certain. At a minimum, effective use of Board signatures as a control requires training Board signers to conduct a proper review of documentation before signing checks. Inattentive or incomplete review of underlying documentation makes the Board member's signature on the check a very poor control and may actually confuse the process of establishing accountability for improper payments.

More meaningful Board control activities may include:

- Explicit Board approval of the Executive Directors annual compensation including all benefits and perks.
- Periodic review of ED payroll and benefits and spot checks of ED expense reimbursements, or in larger organizations, contracting with an accounting professional to conduct such reviews periodically and report results directly to a designated Board member or committee.
- Explicit Board approval of the opening, closing, signature requirements, and modifications for all bank accounts.
- Explicit Board approval of all mortgage debt, lines of credit, or other corporate borrowing.
- Board approval of very significant purchases, typically including all real estate transactions, either purchase or lease.

## Control through Information and Communication

### 20. Why does effective information sharing and communication matter in relation to the COSO approach to internal controls?

No matter how well an organization has designed its control activities, they won't be effective without getting everyone involved to understand both the organization's commitment to integrity and the specific policies and procedures that have been established. And no matter how well prepared and committed individuals are, mistakes happen. One of the most important controls an organization can utilize to ensure the accuracy of its accounting and financial reporting is to ask staff and managers who have direct knowledge of the work of the organization to review financial reports which relate to their area of activities. Providing reports of revenues and expenses in comparison to budget for specific programs to individuals with direct knowledge of the activities of those programs, provides an essential element of control. Of course for this control to work, the individual reviewing the financial info must be able to communicate their questions and concerns to accounting staff that are must be open to examining the causes of the errors and making corrections.

## **21. What is the Board's role in information sharing and communication?**

Board access to and review of financial information provides an additional level of control by creating the opportunity for truly fresh eyes to spot potential errors or problem areas. However, primary responsibility for the accuracy of financial information must remain with management and Board review of financial information should focus primarily on trends and financial health issues, rather than detailed review of cost center accounting. It may be appropriate for the Finance Committee to review the information sharing and communication procedures that management has implemented. CAA Boards should be aware that periods in which funding has been reduced and staff are expected to do more with less often are accompanied by breakdowns in information sharing and communication which can lead to control weaknesses and compliance failures.

## **Monitoring**

### **22. What does "monitoring" mean in the COSO framework?**

While many Community Action Agencies think of "monitoring" as something that funding sources or other external parties provide, the COSO framework focuses on "monitoring" as a key internal function. Effective systems of internal controls include establishing a consistent process through which an organization conducts its own periodic testing and analysis of whether its controls are working.

Larger Community Action Agencies have begun utilizing a high level staff position (Compliance Officer, Internal Auditor, etc.) to design and manage an internal monitoring system. In smaller CAAs in which funds are not be available to support a separate professional position, consultants can be utilized to establishing an internal monitoring system and help assign responsibilities for implementation of the system to specific positions.

While many Fiscal Directors/CFOs are familiar with the concept of internal auditing and have devised various procedures within the fiscal office to monitor compliance with fiscal policies and procedures, systematic monitoring is also needed to ensure compliance with internal policies and procedures and contractual requirements in all aspects of program service delivery as well as in facilities, human resources, and information technology management.

### **23. What is the Boards role in Monitoring?**

Given the CSBG requirements for tri-partite Boards undertaking specific responsibilities, CAAs must also establish effective monitoring procedures for Board governance. Many Boards conduct an annual assessment of their own performance which includes review of the composition of the board and the board's role in needs assessment, planning, and oversight as required by CSGB.

### **24. Why don't auditors and funding source monitors provide all the monitoring we could possibly need?**

First, by the time an auditor or funding source monitor discovers a breakdown in your systems, damage may already have been done. Remember that independent audits are conducted after the fiscal year is completed and in many cases after specific reports to funding sources have been submitted and some funding agreements have been closed. So, it is often too late to correct mistakes without adverse consequences by the time these external monitors find them.

Perhaps more significantly, auditing standards make it extremely clear that the auditor cannot function as part of the system of controls for organizations they audit. If your auditor did function as part of your system of controls, they would no longer be considered independent and couldn't express an opinion on your financial statements. Part of every audit involves the auditor assessing the adequacy of the internal controls of the organization. The absence of an internal monitoring system is a control weakness in the sense that you have not established a systematic way to be sure that the policies and procedures you have put in place are actually working.

## **25. Does having a “clean” audit opinion mean that our CAA doesn’t need to worry about risk assessment and internal controls?**

No! Effective internal controls require continuous risk assessment and consistent implementation of risk mitigation strategies, including regular review and updating of internal controls. Community Action Agencies are operating in a period of rapid change, encompassing both dramatic shifts in the availability of funding resources, and continuously emerging control risks.

A “clean” audit opinion provides the Board with assurance that the independent auditor has concluded that the financial statements fairly present the financial condition of the organization. Auditors use a complex matrix of factors to determine whether any underlying problems with internal controls and compliance are of such significant magnitude that they have resulted in financial statements that do not fairly present the organization’s financial condition. The auditor may have found numerous problems with internal controls and compliance which are very significant in relation to the organization’s compliance with federal requirements but do not reach the level of significance in presentation of the financial statements that would require the auditor to give a “qualified” or not clean opinion. Most CAAs are required to undergo A-133 audits in which the auditor provides additional reports beyond the standard audit opinion letter. In those reports, the auditor identifies specific control and compliance problems. Discussion of these audit findings with the auditor should be an important part of the Board’s risk assessment process.

The completion of an A-133 audit in which the auditor reports no findings, no significant deficiencies or material weaknesses, is a great sign that effective controls have been both designed and implemented. However, even after a successful A-133 audit, Community Action Agencies must continuously assess risks and implement the COSO framework to ensure that current controls are working and to identify emerging risks which must be addressed through new or redesigned controls.

## **Risk Management and Risk Mitigation**

### **26. What is Risk Mitigation?**

Risk mitigation is a term used to describe all the various strategies your CAA uses to reduce or control risks. Risk mitigation can include establishing a positive control environment, adopting and implementing appropriate policies and procedures, hiring competent staff, providing training, monitoring results, and insuring against losses. Once your CAA has identified its most significant risks, the next step will be identifying the risk mitigation strategies that will be most cost effective to control the risks and minimize the damages that the risks may pose to your organization.

### **27. What is Enterprise Risk Management?**

In 1994, COSO released a new framework document – Enterprise Risk Management Integrated Framework –designed to provide more comprehensive guidance for managing risks throughout an organization. The ERM framework incorporates the five key elements of the original COSO Integrated Internal Control Framework (Risk Assessment, Control Environment, Control Activities, Information Sharing and Communication, and Monitoring), and adds 3 additional elements:

- ERM Objective Setting
- ERM Event Identification
- ERM Risk Response

Risk Objective Setting involves high level discussion of an organization’s tolerance and appetite for risks. Most CAAs have extremely limited tolerance for risk due to the pressures of compliance with multiple funding restrictions and compliance requirements and the significance of public opinion in relation to the organization’s access to funding.

Risk Event Identification is a systematic evaluation of the types of risk events which the CAA may encounter, including events that are driven by both external and internal factors. A central element of ERM is the recognition that events are interdependent, not isolated, and that events can have a positive or negative impact, or in some cases both positive and negative impact. Among the external factors considered in an ERM risk identification process are factors relating to economic conditions, the natural environment, political issues, social forces, and technology. Among the internal factors, ERM considers infrastructure, personnel, process, and internal technology.

Ultimately ERM focuses on Risk Response, a systematic process for:

- evaluating strategies to avoid, reduce, share or accept risk;
- evaluating the risk likelihood and impact
- assessing costs versus benefits
- evaluating response opportunities
- utilizing a “portfolio view” to deal with the interdependent issues.

Enterprise Risk Management is now recognized as a key management discipline. Large businesses and governmental entities employ high level ERM Officers. It is probably both unrealistic from a budget standpoint and unnecessary on a practical level for most CAAs to create such positions. However, the underlying concepts should become a part of each CAAs risk assessment process, and larger CAAs may periodically seek pro bono assistance from entities with expert ERM professionals.

## CSBG Basics

### 28. What is CSBG?

The Community Services Block Grant (CSBG) is federal funding provided through the Office of Community Services, a program of the Administration for Children and Families of the U.S. Department of Health and Human Services. CSBG funding is awarded to states, U.S. Territories, and Tribal governments in accord with the provisions of The Community Services Block Grant Act of 1981 as amended by Section 680(a)(2) of the Community Opportunities, Accountability, and Training and Educational Services Act of 1998 (P.L. 105-285).

The Community Services Block Grant (CSBG) provides funds to alleviate the causes and conditions of poverty in communities. OCS awards CSBG funds to States, the District of Columbia, the Commonwealth of Puerto Rico, U.S. Territories, and Federal and State-recognized Indian Tribes and tribal organizations, Community Action Agencies, migrant and seasonal farmworkers or other organizations designated by the States.

The CSBG program provides funds to lessen poverty in communities. The funds may be utilized to provide a range of services and activities to assist the needs of low-income individuals including the homeless, migrants and the elderly. Grant amounts are determined by a formula based on each State’s and Indian Tribe’s poverty population. Grantees receiving funds under the CSBG program are required to provide services and activities addressing employment, education, better use of available income, housing, nutrition, emergency services and/or health.

### 29. What are Community Action Agencies?

Community Action Agencies may be either private nonprofit corporations or public entities that meet the requirements for purpose, governance, and activities specified within the CSBG Act. Community Action Agencies which are operated as private nonprofit corporations organized under state not-for-profit statutes must have governing boards of directors which meet the CSBG Act requirements for Tri-Partite Boards.

When public entity Community Action Agencies operate through a single governmental entity, final authority for their operation rests with the elected governing board of that entity. For example, the County Commission is the final governing authority for a Community Action

Agency operated as part of that county. Some counties choose the form consortiums, through establishing intergovernmental agreements with other counties, to operate a multi-county Community Action Agency. For such consortiums, the intergovernmental agreement establishes the governing structure. Public entity Community Action Agencies are required to establish advisory boards which meet the requirements of the CSBG Act, including the requirement for the tri-partite board.

### **30. What is a Tri-Partite Board?**

The CSBG Act specifies that CSBG eligible entities must be governed by a Tri-Partite Board, which is a board comprised of at least one third representatives of the low income communities served by the entity, one third representatives of elected officials of local governmental entities, and one third representatives of the community at large. The low income representatives of low income communities do not need to be low income themselves but do need to be selected through a “democratic” selection process.

### **31. How are Representatives of Low Income Communities Selected for Service on a Tri-Partite Board?**

The Board may elect individuals who are themselves low income to serve as representatives of low income communities. In order for individuals who are not themselves low income to be considered as “representing low income communities”, they must be chosen in one of the following ways:

- Actual balloting by residents of the low income community
- Election at a community meeting held with proper notice in the low income community
- Selection by community groups which the CAA has designated as being composed primarily of low income people

Details on requirements for election/selection of the low income representatives may be found in Chapter 3 of the CAPLAW CSBG training. The CAPLAW CSBG training can be obtained through this link <http://www.caplaw.org/resources/csbgresources.html>. In addition, one may consult IM-82 for additional guidance with the following link <http://www.acf.hhs.gov/programs/ocs/csbg/guidance/im82.html>.

## Checklists

### **Checklist for Strengthening Controls through fully Engaging Low Income Community Representatives**

Representatives of low income communities on CAA Boards can make significant contributions toward strengthening internal controls. Their relationships with low income individuals and families and knowledge of community perception and needs are essential for effective controls in a Community Action Agency. If you are a low income community representative, you can use this checklist to identify areas in which you may be able to make a greater contribution to your CAA's internal controls.

<b>How is your CAA benefiting from your experience and understanding of the low income community it serves?</b>	<b>Views are sought &amp; used</b>	<b>Opportunity for Improvement</b>
<b>Low Income Community Representatives are encouraged to:</b>		
• Share community perceptions about the integrity, honesty, and effectiveness of CAA services with management and Board committee conducting risk assessment.		
• Share your perception of community needs, including relative importance and urgency of various need areas as part of the CAA's needs assessment process.		
• Share your perceptions regarding the match between the programs and services the CAA offers and community needs as part of the strategic planning process.		
• Share your perception regarding the effectiveness of the CAA's communication strategies in building broad awareness of the programs and services available to low income individuals and families as part of the <i>strategic planning and evaluation processes</i> .		
• Share your understanding of other community resources, including changes in their availability, that may impact the demand for the CAA's services through the strategic planning process		
• Observe program activities and provide feedback about the treatment of participants and quality of services as part of Board evaluation of programs.		
• Participate actively in the Board's discussion of the annual budget to understand the proposed use of resources and express your views about priorities for the use of unrestricted funds.		
• Other areas in which your knowledge of the community is essential to effective operation of the CAA?		
• Fully understand the role of the Board as a whole and the specific responsibilities of low income community representatives required under the terms of funding agreements, including the tri-partite Board requirements contained in the CSBG Act.		
• Fully understand the financial condition of the CAA, including understanding its monthly financial reports		
• Share your perceptions about the effectiveness of board practices, including the processes used at board and committee meetings, as part of the Board's annual self-evaluation.		
• Raise questions and offer observations based on your experience during Board discussions.		
• Share your observations regarding strategies that would support full participation by all low income representatives including meeting times, locations, the availability of child care, transportation, or other needed assistance, interpretation services, and other factors which could increase participation by low income representatives.		

## Program Manager Control Checklist

Program Manager Controls	Implemented Fully	Implemented Partially	Not Implemented
<b>Risk Assessment</b>			
<ul style="list-style-type: none"> <li>You review each new funding agreement related to your program to identify compliance requirements &amp; determine whether adequate control systems are in place to ensure compliance</li> </ul>			
<ul style="list-style-type: none"> <li>You are required to report risks you observe &amp; clear about the process for reporting &amp; investigating your concerns</li> </ul>			
<ul style="list-style-type: none"> <li>You are regularly asked to participate in risk assessment discussions</li> </ul>			
<b>Control Environment</b>			
<ul style="list-style-type: none"> <li>The Board has established an environment which demands honesty and integrity and encourages all staff to report concerns without retaliation</li> </ul>			
<ul style="list-style-type: none"> <li>Management demonstrates the highest standards of honesty &amp; integrity and encourages all staff to report concerns without retaliation</li> </ul>			
<ul style="list-style-type: none"> <li>You seek feedback from staff you supervise to understand their perceptions regarding expectations for honesty and integrity</li> </ul>			
<ul style="list-style-type: none"> <li>Procedures for dealing with concerns about honesty &amp; integrity are clear</li> </ul>			
<ul style="list-style-type: none"> <li>You have confidence that “whistleblowers” will be treated respectfully &amp; will not face retaliation</li> </ul>			
<b>Control Activities</b>			
<ul style="list-style-type: none"> <li>You have meaningful input in the job descriptions and hiring decisions for all positions within your program</li> </ul>			
<ul style="list-style-type: none"> <li>You review &amp; approve the personnel activity reports for all employees you directly supervise</li> </ul>			
<ul style="list-style-type: none"> <li>You utilize consistent procedures to be certain that employees you supervise who function as supervisors are providing meaningful review of personal activity reports for those they supervise</li> </ul>			
<ul style="list-style-type: none"> <li>You are responsible for ensuring that all</li> </ul>			

purchases made through your program are necessary, reasonable, and allowable			
<ul style="list-style-type: none"> <li>You provide input into procurement requirements for goods and services which will be utilized for your program</li> </ul>			
<b>Information Sharing &amp; Communication</b>			
<ul style="list-style-type: none"> <li>You have easy access to current fiscal policies and procedures which are clear and understandable</li> </ul>			
<ul style="list-style-type: none"> <li>You receive regular training regarding changes in fiscal policies and procedures and your responsibilities in regard to maintain fiscal controls</li> </ul>			
<ul style="list-style-type: none"> <li>You have access to information about requirements contained in all funding agreements supporting your program and receive regular training regarding changes or problem areas</li> </ul>			
<ul style="list-style-type: none"> <li>You have adequate time and support to communicate fully with employees you supervise regarding fiscal and program policies and procedures, quality standards, and control expectations</li> </ul>			
<ul style="list-style-type: none"> <li>You provide regular input into the design of training and resource materials to assist staff in understanding and complying with control policies and procedures</li> </ul>			
<b>Monitoring</b>			
<ul style="list-style-type: none"> <li>You systematically review program service data from programs you supervise to ensure that they are complete and accurate</li> </ul>			
<ul style="list-style-type: none"> <li>You review monthly financial data for programs you supervise, comparing actual to budget, and identifying potential errors or omissions</li> </ul>			
<ul style="list-style-type: none"> <li>You fully understand the process to report and resolve program and financial data questions and errors is clear and follow it consistently</li> </ul>			

## Board and Board Committees Controls Checklist

Board and Board Committees Controls Checklist	Document Reviewed	Reviewer	Date
<b>1. Board Policies</b>			
• Conflict of Interest			
• CEO Evaluation and Compensation Setting			
• Audit Policy			
• Investment Policy			
• Risk Management Policy			
• Tri-Partite Board Composition			
• Board Role in Needs Assessment & Planning			
<b>2. Implementation of Board Policies</b>			
• Conflict of Interest Procedures			
• CEO Evaluation			
• CEO Compensation Review & Setting			
• Procedure for Auditor selection & audit review			
• Investment performance review			
• Risk management review			
• Board composition review			
• Board participation in needs assessment & strategic planning			
<b>3. Full Board Financial Oversight</b>			
• Establish Finance & Audit Committees			
• Review performance of Finance & Audit Committees			
• Annual budget approval			
• Monthly financial statement review			
• Review of annual independent audit			
<b>4. Finance Committee Checklist</b>			
• Review draft annual budget for consistency with board policy and strategies			
• Recommend annual budget for board approval			
• Review monthly financial statements including Statement of Financial Position, Statement of Activities, and Statement of Cash Flows			
• Review management recommendations for addressing financial challenges and make recommendations to full board			
• Review cash management policies			
• Evaluate use of lines of credit and management proposals for borrowing – forward recommendations for full board approval for borrowing			

<b>5. Check Signer Checklist</b>			
<ul style="list-style-type: none"> <li>Review underlying documentation for all checks to verify proper approvals, consistency in payee and amount and overall reasonableness</li> </ul>			
<ul style="list-style-type: none"> <li>Decline to sign until questions are resolved</li> </ul>			
<ul style="list-style-type: none"> <li>Report repeated errors to Audit Committee</li> </ul>			
<b>6. Audit Committee Responsibilities</b>			
<ul style="list-style-type: none"> <li>Auditor selection</li> </ul>			
<ul style="list-style-type: none"> <li>Establish direct communication with auditor</li> </ul>			
<ul style="list-style-type: none"> <li>Review of audit findings</li> </ul>			
<ul style="list-style-type: none"> <li>Confidential discussion with auditor</li> </ul>			
<ul style="list-style-type: none"> <li>Recommendations to Board and management regarding audit findings</li> </ul>			
<ul style="list-style-type: none"> <li>Evaluate performance of Finance Committee</li> </ul>			
<b>7. Investment Oversight</b>			
<ul style="list-style-type: none"> <li>Policy review and update</li> </ul>			
<ul style="list-style-type: none"> <li>Selection of investment advisors/managers</li> </ul>			
<ul style="list-style-type: none"> <li>Review performance of investment managers</li> </ul>			
<b>8. Board Risk Management Oversight</b>			
<ul style="list-style-type: none"> <li>Review &amp; revised management's risk assessment</li> </ul>			
<ul style="list-style-type: none"> <li>Identify risk appetite/tolerance levels</li> </ul>			
<ul style="list-style-type: none"> <li>Review management's risk mitigation plan</li> </ul>			
<ul style="list-style-type: none"> <li>Obtain periodic independent review of risk assessment &amp; risk mitigation plan</li> </ul>			
<ul style="list-style-type: none"> <li>Review adequacy of insurance coverage</li> </ul>			
<ul style="list-style-type: none"> <li>Advice full Board regarding significant risks which have not been adequately mitigated</li> </ul>			
<b>9. Board Compliance Oversight</b>			
<ul style="list-style-type: none"> <li>Identify Board committee responsible for Compliance Oversight and establish committee charge</li> </ul>			
<ul style="list-style-type: none"> <li>Review compliance findings in independent audit and/or monitoring reports</li> </ul>			
<ul style="list-style-type: none"> <li>Monitor progress in resolving findings and improving compliance</li> </ul>			
<ul style="list-style-type: none"> <li>Review management's structure for achieving compliance</li> </ul>			
<ul style="list-style-type: none"> <li>Discuss management's compliance structure with independent auditor</li> </ul>			

## Control Review Checklist

Control	Control documentation reviewed	Reviewed by	Review date
<b>Control Environment</b>			
Conflict of Interest P&P			
Whistleblower Policy			
Code of Ethics/Integrity policy			
Board evaluation of CEO			
Board review of compensation & management capacity			
Board review of monthly financial statements			
Board audit committee/auditor discussions			
Board review of resolution of audit & monitoring findings			
Board review of programmatic accomplishments			
Other			
<b>General Risk Assessment</b>			
External risk review including funding environment, community perception, changing demand/need for services			
Review and update of internal risk identification			
Exposure analysis- ranking of risks by significance of potential losses and likelihood of occurrence			
<b>Contract Compliance Risk Assessment:</b>			
OMB A-110 requirements			
• Allowable activities			
• Allowable cost			
• Cash management			
• Davis Bacon act			
• Eligibility			
• Equip/Real Property management			
• Matching/level of effort			
• Period of availability of fed funds			
• Procurement, suspension & debarment			
• Program income			
• Real property acquisition			
• Reporting			
• Sub recipient monitoring			
• Special tests & provisions			
OMB A-122 requirements			
• Current approved federal indirect cost rate			

<ul style="list-style-type: none"> <li>Monitoring of actual indirect costs in comparison to budget</li> </ul>			

<b>Control</b>	<b>Control documentation reviewed</b>	<b>Reviewed by</b>	<b>Review date</b>
CFR Requirements			
<ul style="list-style-type: none"> <li>Review of CFRs for each funding source</li> <li>Policies &amp; procedures to assure compliance with CFR requirements varying from OMB Circulars</li> </ul>			
<b>Control Activities</b>			
Written fiscal and operational policies & procedures			
Top management review of financial & program activities			
Management reviews at program or functional level			
Controls over info processing/IT			
Physical controls over vulnerable assets			
Review of performance indicators			
Segregation of duties			
Proper execution of transactions & events			
Accurate & timely recording of events			
Access restrictions & accountability for resources & records			
Appropriate documentation of transactions & internal control			
<b>Information &amp; Communication</b>			
Monthly financial reporting at program and organization level			
Monthly program accomplishment reporting at program & organizational level			
Manager access to operational and financial data as needed for planning and oversight			
Structures, policies, and procedures to encourage open information flow among all levels of the organization			
<b>Monitoring</b>			
Monthly comparison of planned program and financial activity to actual reviewed by program managers, top management, & Board			
System for tracking all audit & monitoring findings and their correction or resolution			

Responsibility for achieving correction or resolution of all findings clearly assigned			
Authority to resolve/correct findings clearly assigned			

Control	Control documentation reviewed	Reviewed by	Review date
<b>Monitoring – continued</b>			
Progress resolving/correcting findings monitored regularly by CEO & Board			
Reconciliations to verify financial & program data reports routinely completed and reviewed by managers			

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# The Agricultural & Labor Program, Inc.

Community Assessment Survey

11/13/2018

Florida Survey Research Center – University of Florida

Tracy L. Johns, Ph.D.



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## Introduction

This project was developed to assist the Agricultural and Labor Program, Inc. (ALPI) in better understanding the service needs and demographic characteristics of low-income children and families in the ALPI service area which includes Polk, Highlands, St. Lucie, Indian River, Okeechobee, Martin, Volusia, Hillsborough (Plant City, Wimauma), Palm Beach (Belle Glade, South Bay), Hendry, Glades, Collier, Orange, Seminole, and Hardee Counties. To this end, two surveys were completed – one with ALPI service recipients and one with community organizations that serve this population.

The service recipient survey was designed to assess the need for and use of various social services for children and adults in the ALPI service area. The survey instrument included a variety of questions about the need for, use of, and level of satisfaction with, services for children and services for adults; child care services; social services; and, demographic characteristics of respondents. The specific categories of questions are as follows:

- Services for Adults (Need, Use, Satisfaction);
- Social Services (Use, Satisfaction);
- Child Care Services (Need, Use);
- Services for Children under Age Five (Need, Use, Satisfaction);
- Health Care for Children;
- Disabilities of Children in Household;
- Demographics:
  - Transportation
  - Housing
  - Household Structure
  - Household Income
  - Race/Ethnicity
  - Employment Status
  - Education
  - Number of Adults and Children in Household
  - Zip Code.

The community organization survey instrument included a variety of questions about organizations and agencies in the area, including services provided and perceived barriers to low-income families receiving assistance in the community. The specific question categories are as follows:

- Basic contact information for the organization/agency
- Types of services the organization/agency provides
- Perceived barriers to low-income families receiving assistance in the community
- Perceived changes in service availability for low-income families in the community
- Perceived changes in service needs in the community
- Perceived need for child care services in the community
  - Current child care providers
  - Barriers to securing child care services
- Additional comments on needs of low-income families in the community

The results of these surveys provide ALPI with a substantial amount of information about the service needs and demographic characteristics of low-income families in the ALPI service, as well as area service providers in the ALPI service area.

## Format of the Report

This report is divided into several sections that correspond to the key questions that were asked in the surveys. Results are first presented for the client survey, then for the community organization survey.

The report attempts to enhance the understanding of the survey results by first providing an executive summary. This summary permits a brief review of the results. More detailed information can be obtained from a close reading of the tables and figures in the sections that follow. Each section presents the results of the survey as well as detailed analysis of these results.

## Survey Procedure and Methodology

### Client Survey

The survey of low-income families in the ALPI service area was conducted jointly by the Florida Survey Research Center (FSRC) and ALPI. The universe of the study is low-income families with children in the Florida counties who are served by ALPI, which includes Polk, Highlands, St. Lucie, Indian River, Okeechobee, Martin, Volusia, Hillsborough (Plant City, Wimauma), Palm Beach (Belle Glade, South Bay), Hendry, Glades, Collier, Orange, Seminole, and Hardee Counties. While there are several different approaches to conducting survey research, such as mail, telephone, and in-person interviews, mail surveys do have advantages in some cases. Since low-income families are less likely to have regular telephone service, and are more likely to be transitory, distribution/mail surveys can be an effective means of reaching these groups.

The FSRC developed the survey instrument, and constructed the survey packets that were distributed to potential respondents by ALPI. The instrument was designed as a four-page booklet, a design proven to promote higher response rates. The survey packets contained a cover letter on FSRC letterhead explaining the purpose of the survey and the survey process, a survey booklet, and a postage-paid return envelope. To best reach all groups of interest, packets were prepared in English, Spanish, and Creole.

The FSRC provided ALPI with 3,000 survey packets which they distributed in the ALPI service area. The 200 completed surveys were logged-in, data reduced, and analyzed using the SPSS statistical analysis package.

In order to ensure that the survey data most accurately represent the true population of ALPI clients, responses were weighted to reflect actual population demographics. The true population's educational attainment was calculated and the sample responses were mathematically adjusted to properly reflect this characteristic. This computation adjusts sample responses to more closely mirror the true population of interest.

## Executive Summary

### Adult Services

More than two in five (45.3%) respondents reported household need for “Emergency Assistance for Rent, Utilities, Housing, Food, etc.” and similar number (43.6%) of respondents said they had used “Emergency Assistance for Rent, Utilities, Housing, and Food.” About one in three (34.4%) respondents said they need “Home-ownership Programs” while fewer than one in ten (8.1%) said that they have used this service.

About one in four respondents indicated that they need: “Financial/Credit Counseling Services” (24.5%) with about one in ten (9.3%) having used such programs; “Adult Health-care Insurance” (24.3%) with about one in eight (11.7%) respondents having used such programs; or, “Employment/Job Placement Services” (23.9%) with about one in six (16.9%) having used these types of programs. Approximately one in five (21.2%) respondents reported a need for “Job Training” while about one in six (17.1%) said they had used it.

About 15 percent of respondents reported a need for: “High school degree/GED Programs” (16.0%), with about one in eight (13.9%) having used these programs; “Public Transportation” (14.9%), with one in four respondents (24.3%) having used it; “Continuing/Post High School Education” (14.7%), with one in ten (9.9%) having used such services; or, “Legal Services” (14.1%), with fewer than one in ten (7.4%) having used these services.

One in eight (12.4%) respondents reported a need for “Parenting Training” and about one in ten (11.0%) said they had used these services. One in ten (10.4%) respondents indicated a need for “Literacy/Reading Programs” with only about four percent (4.2%) having used such programs.

The largest unmet need for adult services is “Home-Ownership Programs.” About one in four (26.3%) respondents had unmet needs for “Home-Ownership Programs.” About one in six (15.2%) respondents had an unmet need for “Financial/Credit Counseling.” About one in eight (12.6%) respondents showed an unmet need for “Adult Health Insurance.” About one in ten (7.0%) respondents had unmet needs for “Employment/Job Placement Services.”

The respondents were generally satisfied with the adult services that they received. More than nine in ten respondents were either “Very Satisfied” or “Somewhat Satisfied” with each of the adult services they utilized. “Literacy/Reading Programs” (100.0%), “Parenting Training” (91.7%) and “Emergency Assistance for Rent, Utilities, Food, etc.” (81.4%) had the highest reported levels of satisfaction with services received. “Public Transportation” (9.1%), “Homeownership Programs: (9.1%), and “Legal Services” (9.1%) had the highest percentages of users who reported they were “Not Satisfied” with services received.

### Social Services

Seven in ten (70.8%) respondents used services provided by “Access Florida.” Three in five (60.1%) respondents used services provided by the “Agricultural and Labor Program (ALPI),” and a similar number (57.4%) used services provided by the “Department of Children and Families.” About half (51.9%) of the respondents used services provided by the “Health Department/Walk-in Clinics.”

About one in five respondents used the services of “Workforce Development” (20.5%) or the “Salvation Army” (18.6%). One in eight respondents said they used services provided by “Catholic Charities” (12.5%), and about one in ten used the services of the “United Way” (8.1%) or the “Community Services Department” (7.7%).

Again, the respondents are generally satisfied with the services they received from a variety of agencies that provide social services. More than nine in ten respondents are either “Very Satisfied” or “Somewhat Satisfied” with services they received from each of the organizations noted.

The highest level of satisfaction is with the “Agricultural and Labor Program (ALPI)” – more than four in five (87.7%) respondents who received services from ALPI were “Very Satisfied” with those services. Similarly, more than four in five respondents who used the services of “Catholic Charities” (85.7%) and the “United Way” (84.6%) were “Very Satisfied” with the services they received, and nearly as many (80.0%) respondents who received services at the “Community Services Department” were “Very Satisfied.”

About three in four respondents who received services from “Workforce Development” (76.5%) or the “Salvation Army” (75.0%) were “Very Satisfied,” and nearly the same percentage were “Very Satisfied” with services they received from the “Access Florida” (72.4%), the “Department of Children and Families” (71.7%), or the “Health Department/Walk-in Clinics” (65.9%).

The highest level of dissatisfaction was with services provided by the “Department of Children and Families”; still, fewer than one in ten (4.3%) respondents who used services provided by DCF reported that they were “Not at All Satisfied” with the services they received.

### Children's Services

About one in four (23.9%) respondents who have children under the age of five reported that they need child care “In the morning, before 7:30 AM” but just one in five (19.0%) said they currently use this type of care. About one in five (19.1%) respondents with children under the age of five said they need child care “In the afternoon, after 5:30 PM,” while fewer than one in ten (9.2%) currently use it. About one in six (15.9%) respondents with young children reported a need for child care “12 Months of the Year,” while one in ten (10.0%) currently use this service.

One in ten respondents with young children indicated a need for child care on either “Weekends” (10.1%), though few (1.1%) use these services. Similarly, just under one in ten respondents with children under age five reported a need for “Holiday” (7.3%) or “Over-night” (7.3%) child care and almost none currently use this type of service.

The largest unmet needs for child care services are for child care “In the afternoon, after 5:30 PM” and on “Weekends.” About one in ten respondents with children under the age of five has unmet needs for child care at these times. Fewer than one in ten respondents with young children have an unmet need for child care “In the morning, before 7:30 AM” (4.9%); “12 Months of the year” (5.9%); “Over-night” (6.2%); or, on “Holidays” (6.2%).

Nearly three in five (56.5%) respondents with children under age five reported needed “Pre-Kindergarten Programs” for their children with more than four in five (85.3%) saying they had used such services. About two in five (42.1%) respondents with young children indicated a need for “Dental Services” for their children under age five and three in five (62.1%) had used such services. About two in

five (38.3%) respondents with children under age five reported needing “Child Care” for their children with about half (50.8%) saying they had used such services.

About two in five (37.1%) respondents with children under age five indicated a need for the services of the “Women, Infant, and Children (WIC) Program” for their children and about three in four (74.8%) said they had ever used these services. One in four or fewer respondents with children under the age of five reported needing the following services for their children: “Vision Services” (24.9%); “Speech Therapy” (22.4%); “Nutritional Services” (17.1%); or, “Mental Health Services” (15.3%).

All of the respondents who needed services for their children under the age of five actually received those services.

There is a very high level of satisfaction with services for children under the age of five. More than nine of ten respondents who used these services for their children were either “Very Satisfied” or “Somewhat Satisfied” with them. The highest levels of satisfaction were for “Pre-Kindergarten Programs” (91.2%), “Dental Services” (90.3%), and “Mental Health Services” (90.0%) – at least nine in ten respondents who used these programs were “Very Satisfied.” Respondents were least satisfied with “Child Care” they used for their children – about five percent of respondents who used these services was “Not at All Satisfied” with them.

Three in four (74.8%) respondents whose children currently have health insurance indicated that they had health insurance for their children from Medicaid/Medipass. About one in eight (12.6%) of these respondents had “Private Insurance” for their children. One in ten (9.1%) of these respondents use “Healthy Kids” as a source of health insurance for their children, and a similar number (8.4%) of respondents with insurance for their children obtained health insurance from “Children’s Medical Services.”

About one in eight (12.3%) respondents with children under age five report having children in their households who have ever been diagnosed with either a physical or mental disability. The most frequently cited disabilities that respondents’ children had been diagnosed with were ADHD / ADD (n=6), various types of speech-related disabilities (n=3), asthma (n=2), Sickle Cell disease (n=2), OCD (n=2), and autism (n=2). The most frequently cited services that respondents’ children had received were speech therapy (n=5), various types of hematology (n=3), and occupational therapy (n=2). Two of the respondents noted children in their households received care at Nemours Children’s Hospital.

## Demographics

Nearly nine in ten (87.6%) respondents said they most often rely on their “Own car” for transportation, while about one in ten (10.3%) said they rely on “Friends or Family members.” Three (1.5%) respondents indicated they most often rely on “Public Transportation,” and one respondent said he or she relies on a “Taxi.”

More than two in five (44.6%) respondents said they live in an apartment or house that they rent without subsidies. About one in three (35.4%) respondents said they live in a house that they own. One in eight (12.3%) respondents indicated living in an apartment or house that they rent with subsidies (such as Section 8 vouchers). Fewer than one in ten respondents said they live in manufactured housing/mobile homes (0.5%) or a condominium/townhouse (1.0%).

More than two in five (44.6%) of the respondents live in a “Single mother household.” Nearly two in five (37.3%) respondents said they live in a “Mother and father household.” Fewer than one in ten respondents said they live in a household with a grandparent or other family member as head of household (6.2%), a “Single father household” (0.5%), or “Foster-parent” household (0.5%).

About one in six (15.6%) respondents reported a total household income before taxes below \$5,000, and a similar number (14.1%) reported a household income between \$5,000 and \$10,000. One in ten (10.4%) respondents cited a household income between \$10,001 and \$15,000. About one in five (22.9%) respondents indicated a household income between \$15,001 and \$20,000.

Fewer than one in ten respondents reported a household income: between \$20,001 and \$25,000 (9.4%); between \$25,001 and \$30,000 (6.8%); or, between \$30,001 and \$35,000 (3.6%). One in ten respondents (10.9%) said their income was more than \$35,000.

About two in three (68.0%) respondents said they are “African American/Black.” About one in ten (7.2%) respondents said they are “White/Caucasian,” and about one in five (18.6%) respondents indicated they are “Latino/Hispanic.” Fewer than one in ten respondents indicated they are “Biracial/Multiracial” (3.1%) or “Asian” (0.5%).

Nearly half (48.2%) of the respondents are “Employed full-time,” while one in five (20.0%) are “Employed part-time.” About one in six (16.4%) respondents said they are “Not employed.” Fewer than one in ten respondents indicated that they are either “Disabled” (6.7%) or “Retired” (5.6%).

Two in five (40.0%) respondents indicated they have a high school diploma or GED certificate, and about one in eight (13.7%) said they had some high school education but had not graduated from high school. One in six (16.3%) respondents said they had some college, and one in five (20.5%) said they have a college degree.

Fewer than one in ten (6.9%) respondents said they live alone. About one in six (15.3%) respondents indicated they live in households that have two people. About one in five (21.7%) respondents live in households that have three people and a similar number (20.6%) live in four-person households. About one in six (17.5%) respondents live in five-person households. About one in five (18.0%) respondents live in households with six or more people.

One in four (24.7%) respondents indicated that no children, age five or younger, live in their household. About one in three (35.3%) respondents said that one child, age five or younger, lives in their household. About one in four (26.3%) respondents indicated that two children, age five or younger, live in their households. Fewer than one in ten respondents said three (7.4%), four (4.7%), or five (1.6%) children, age five or younger live in their households.

Respondents with children age five and younger (n=143) provided ages for a total of 212 children. Of these children, about one in five (22.7%) were one-year old or younger, and about one in six (16.0%) were two-years-old. About one in five (21.2%) of these children were three-years-old, and nearly one in three (30.2%) were four-years-old. One in ten (9.9%) were five-years-old.

Respondents were given the option to complete the survey in Spanish. Of the 200 completions, 10 were completed in Spanish.

## Results: Client Survey

### Adult Services

The survey first asked respondents a series of questions about 12 services for adults. The services included in this section are as follows:

- Emergency assistance for rent, utilities, food, housing, etc.;
- Public transportation;
- Job training;
- Parenting training;
- Home-ownership programs;
- Literacy/Reading programs;
- High school degree/GED programs;
- Continuing/Post high school education programs;
- Adult health-care insurance;
- Employment/placement services;
- Legal services;
- Financial/Credit counseling.

### Use of Adult Services

The survey asked respondents if any adults in their households **need** the service or program, if they have actually **used** the service or program, and, if they have used the service, their **level of satisfaction** with the service. Table 1 presents the percentage of adult respondents who need and/or use each service.

Table 1: Need and Use of Adult Services

Service	Need	Use
Emergency Assistance for Rent, Utilities, Housing, Food, etc.	45.3%	43.6%
Home-ownership Programs	34.4%	8.1%
Financial/Credit Counseling	24.5%	9.3%
Adult Health-care Insurance	24.3%	11.7%
Employment/Job Placement Services	23.9%	16.9%
Job Training	21.2%	17.1%
High school degree/GED Programs	16.0%	13.9%
Public Transportation	14.9%	24.3%
Continuing/Post High School Education	14.7%	9.9%
Legal Services	14.1%	7.4%
Parenting Training	12.4%	11.0%
Literacy/Reading Programs	10.4%	4.2%

More than two in five (45.3%) respondents reported household need for “Emergency Assistance for Rent, Utilities, Housing, Food, etc.” and similar number (43.6%) of respondents said they had used “Emergency Assistance for Rent, Utilities, Housing, and Food.” About one in three (34.4%) respondents said they need “Home-ownership Programs” while fewer than one in ten (8.1%) said that they have used this service.

About one in four respondents indicated that they need: “Financial/Credit Counseling Services” (24.5%) with about one in ten (9.3%) having used such programs; “Adult Health-care Insurance” (24.3%) with about one in eight (11.7%) respondents having used such programs; or, “Employment/Job Placement Services” (23.9%) with about one in six (16.9%) having used these types of programs. Approximately one in five (21.2%) respondents reported a need for “Job Training” while about one in six (17.1%) said they had used it.

About 15 percent of respondents reported a need for: “High school degree/GED Programs” (16.0%), with about one in eight (13.9%) having used these programs; “Public Transportation” (14.9%), with one in four respondents (24.3%) having used it; “Continuing/Post High School Education” (14.7%), with one in ten (9.9%) having used such services; or, “Legal Services” (14.1%), with fewer than one in ten (7.4%) having used these services.

One in eight (12.4%) respondents reported a need for “Parenting Training” and about one in ten (11.0%) said they had used these services. One in ten (10.4%) respondents indicated a need for “Literacy/Reading Programs” with only about four percent (4.2%) having used such programs.

#### Unmet Need for Adult Services

The next analysis in this series on adult services is designed to provide a rough estimate of the unmet need for services. The unmet need for adult services is calculated by subtracting the percentage of respondents who have used a service from the percentage who indicate that they need a service. We caution that this is only a rough estimate of unmet need, but it does provide an indication of the categories of services in which additional services could be provided. The results of the analysis of unmet need are presented in Table 2.

Table 2: Estimated Unmet Need for Adult Services

Service	Unmet Need
Home-ownership Programs	26.3%
Financial/Credit Counseling	15.2%
Adult Health Insurance	12.6%
Employment/Job Placement Services	7.0%
Legal Services	6.7%
Literacy/Reading Programs	6.2%
Continuing/Post High School Education	4.8%
Job Training	4.1%
High school degree/GED Programs	2.1%
Emergency Assistance for Rent, Utilities, Housing, Food, etc.	1.7%
Parenting Training	1.4%
Public Transportation	N/A

The largest unmet need for adult services is “Home-Ownership Programs.” About one in four (26.3%) respondents had unmet needs for “Home-Ownership Programs.” About one in six (15.2%) respondents had an unmet need for “Financial/Credit Counseling.” About one in eight (12.6%) respondents showed an unmet need for “Adult Health Insurance.” About one in ten (7.0%) respondents had unmet needs for “Employment/Job Placement Services.”

Fewer than one in ten respondents had unmet needs for “Legal Services” (6.7%); “Literacy/Reading Programs” (6.2%); “Continuing/ Post High School Education” (4.8%); “Job Training” (4.1%); “High school degree/GED Programs” (2.1%); “Emergency Assistance for Rent, Utilities, Housing, Food, etc.” (1.7%); or, “Parenting Training” (1.4%).

### Level of Satisfaction with Adult Services

The last part of this series on adult services asked respondents who have actually used the services to indicate their level of satisfaction with the services. The possible responses to this question are “Very Satisfied,” “Somewhat Satisfied,” and “Not Satisfied.” The responses to this question are presented in Table 3.

Table 3: Level of Satisfaction with Adult Services

Service	Very Satisfied	Somewhat Satisfied	Not Satisfied
Literacy/Reading Programs	100.0%	0.0%	0.0%
Parenting Training	91.7%	8.3%	0.0%
Emergency Assistance for Rent, Utilities, Food, etc.	81.4%	15.7%	2.9%
High School Degree/GED Programs	75.0%	18.8%	6.3%
Adult Health Insurance	75.0%	25.0%	0.0%
Continuing/Post High School Education	66.7%	25.0%	8.3%
Public Transportation	66.7%	24.2%	9.1%
Employment/Job Placement Services	65.2%	26.1%	8.7%
Financial/Credit Counseling	64.3%	28.6%	7.1%
Home-Ownership Programs	63.6%	27.3%	9.1%
Job Training	56.5%	39.1%	4.3%
Legal Services	54.5%	36.4%	9.1%

The respondents were generally satisfied with the adult services that they received. More than nine in ten respondents were either “Very Satisfied” or “Somewhat Satisfied” with each of the adult services they utilized.

“Literacy/Reading Programs” (100.0%), “Parenting Training” (91.7%) and “Emergency Assistance for Rent, Utilities, Food, etc.” (81.4%) had the highest reported levels of satisfaction with services received.

“Public Transportation” (9.1%), “Homeownership Programs: (9.1%), and “Legal Services” (9.1%) had the highest percentages of users who reported they were “Not Satisfied” with services received.

## Social Services

The survey next asked respondents about a variety of agencies that make social services available to those in need. For each agency, the respondent was asked to indicate if he/she uses the services provided by the agency and, if used, the level of satisfaction with the services provided by the agency. The agencies included in this question are as follows:

- Agricultural and Labor Program (ALPI);
- Salvation Army;
- United Way;
- Catholic Charities;
- Department of Children and Families;
- Health Department/Walk-in Clinics;
- Workforce Development;
- Community Services Department;
- Access Florida;
- Other.

### Use of Social Services

Table 4 presents the percentage of respondents who indicate that they have used the services provided by the various organizations listed in the survey.

Table 4: Use of Social Services

Services	Used
Access Florida	70.8%
Agricultural and Labor Program (ALPI)	60.1%
Department of Children and Families	57.4%
Health Department/Walk-in Clinics	51.9%
Workforce Development	20.5%
Salvation Army	18.6%
Catholic Charities	12.5%
United Way	8.1%
Community Services Department	7.7%
Other (described below)	3.0%

Seven in ten (70.8%) respondents used services provided by “Access Florida.” Three in five (60.1%) respondents used services provided by the “Agricultural and Labor Program (ALPI),” and a similar number (57.4%) used services provided by the “Department of Children and Families.” About half (51.9%) of the respondents used services provided by the “Health Department/Walk-in Clinics.”

About one in five respondents used the services of “Workforce Development” (20.5%) or the “Salvation Army” (18.6%). One in eight respondents said they used services provided by “Catholic Charities” (12.5%), and about one in ten used the services of the “United Way” (8.1%) or the “Community Services Department” (7.7%).

In addition, three respondents indicated “Other” social services they use. The one respondent who described these services said “Food stamps during Hurricane Irma.”

## Satisfaction with Services Provided by Organizations

Next, respondents who have used the services provided by these organizations were asked to indicate their satisfaction with these services. The possible responses to this question are “Very Satisfied,” “Somewhat Satisfied,” or “Not at All Satisfied” with the services provided by the organization. The responses to the satisfaction question are provided in Table 5.

Table 5: Level of Satisfaction with Social Services

Services	Very Satisfied	Somewhat Satisfied	Not Satisfied
Agricultural and Labor Program (ALPI)	87.7%	11.3%	0.9%
Catholic Charities	85.7%	14.3%	0.0%
United Way	84.6%	15.4%	0.0%
Community Services Department	80.0%	20.0%	0.0%
Workforce Development	76.5%	20.6%	2.9%
Salvation Army	75.0%	21.9%	3.1%
Access Florida	72.4%	24.1%	3.4%
Department of Children and Families	71.7%	23.9%	4.3%
Health Department/Walk-in Clinics	65.9%	32.9%	1.2%

Again, the respondents are generally satisfied with the services they received from a variety of agencies that provide social services. More than nine in ten respondents are either “Very Satisfied” or “Somewhat Satisfied” with services they received from each of the organizations noted.

The highest level of satisfaction is with the “Agricultural and Labor Program (ALPI)” – more than four in five (87.7%) respondents who received services from ALPI were “Very Satisfied” with those services. Similarly, more than four in five respondents who used the services of “Catholic Charities” (85.7%) and the “United Way” (84.6%) were “Very Satisfied” with the services they received, and nearly as many (80.0%) respondents who received services at the “Community Services Department” were “Very Satisfied.”

About three in four respondents who received services from “Workforce Development” (76.5%) or the “Salvation Army” (75.0%) were “Very Satisfied,” and nearly the same percentage were “Very Satisfied” with services they received from the “Access Florida” (72.4%), the “Department of Children and Families” (71.7%), or the “Health Department/Walk-in Clinics” (65.9%).

The highest level of dissatisfaction was with services provided by the “Department of Children and Families”; still, fewer than one in ten (4.3%) respondents who used services provided by DCF reported that they were “Not at All Satisfied” with the services they received.

## Children's Services

The next series of questions in the survey asked respondents a number of questions about children under the age of five who reside in their households and the various services that these children might need. The following sections provide detailed information about these children and their need for and use of various services.

### Child Care Services

The survey asked respondents about their need for child care services. The child care services included in this question are as follows:

- In the morning, before 7:30 a.m.;
- In the afternoon, after 5:30 p.m.;
- Over-night child care;
- Weekend child care;
- Holiday child care;
- 12 months of the year care.

This question first asked respondents if the child care service is needed and then if they currently use this type of child care. Table 6 presents the results of the percentage of respondents who need and/or use various child care services. (Note: Level of satisfaction with child care services was not asked.)

Table 6: Need and Use of Child Care Services

Services	Need	Use
In the morning, before 7:30 AM	23.9%	19.0%
In the afternoon, after 5:30 PM	19.1%	9.2%
12 months of the year	15.9%	10.0%
Weekends	10.1%	1.1%
Holidays	7.3%	1.1%
Over-night	7.3%	1.1%

About one in four (23.9%) respondents who have children under the age of five reported that they need child care "In the morning, before 7:30 AM" but just one in five (19.0%) said they currently use this type of care. About one in five (19.1%) respondents with children under the age of five said they need child care "In the afternoon, after 5:30 PM," while fewer than one in ten (9.2%) currently use it. About one in six (15.9%) respondents with young children reported a need for child care "12 Months of the Year," while one in ten (10.0%) currently use this service.

One in ten respondents with young children indicated a need for child care on either "Weekends" (10.1%), though few (1.1%) use these services. Similarly, just under one in ten respondents with children under age five reported a need for "Holiday" (7.3%) or "Over-night" (7.3%) child care and almost none currently use this type of service.

### Unmet Need for Child Care Services

The last analysis of this series on child care services is designed to provide an estimate of the unmet need for services. The unmet need for child care services is calculated by subtracting the percentage of respondents who currently use a service from the percentage who indicate that they need the service. It is important to note that this is only an approximate estimate of unmet need, but does provide some indication of the child care services that might be used if made available. The results of the analysis of unmet need are presented in Table 7.

Table 7: Unmet Need for Child Care Services

Services	Unmet Need
In the afternoon, after 5:30 PM	9.9%
Weekends	9.0%
Holidays	6.2%
Over-night	6.2%
12 Months of the year	5.9%
In the morning, before 7:30 AM	4.9%

The largest unmet needs for child care services are for child care “In the afternoon, after 5:30 PM” and on “Weekends.” About one in ten respondents with children under the age of five has unmet needs for child care at these times.

Fewer than one in ten respondents with young children have an unmet need for child care “In the morning, before 7:30 AM” (4.9%); “12 Months of the year” (5.9%); “Over-night” (6.2%); or, on “Holidays” (6.2%).

### Use of Services for Children under Age Five

The survey next asked respondents a series of questions about services for children under the age of five. The specific services that the survey asked about are as follows:

- Pre-Kindergarten Programs;
- Dental Services;
- Mental Health Services;
- Vision Services;
- Nutritional Services;
- Speech Therapy;
- Women, Infants and Children (WIC) Program;
- Child care.

The survey first asked respondents if they need each of the services, then, if they have ever used the service, and, if they have used the service, the level of satisfaction with the service. Table 8 presents the responses regarding the need and use of services for children under age five.

Table 8: Need and Use of Children’s Services

Services	Need	Ever Used
Pre-Kindergarten Programs	56.5%	85.3%
Dental Services	42.1%	62.1%
Child Care	38.3%	50.8%
Women, Infant and Children (WIC) Program	37.1%	74.8%
Vision Services	24.9%	34.6%
Speech Therapy	22.4%	32.7%
Nutritional Services	17.1%	25.7%
Mental Health Services	15.3%	22.3%

Nearly three in five (56.5%) respondents with children under age five reported needed “Pre-Kindergarten Programs” for their children with more than four in five (85.3%) saying they had used such services. About two in five (42.1%) respondents with young children indicated a need for “Dental Services” for their children under age five and three in five (62.1%) had used such services. About two in five (38.3%) respondents with children under age five reported needing “Child Care” for their children with about half (50.8%) saying they had used such services.

About two in five (37.1%) respondents with children under age five indicated a need for the services of the “Women, Infant, and Children (WIC) Program” for their children and about three in four (74.8%) said they had ever used these services.

One in four or fewer respondents with children under the age of five reported needing the following services for their children: “Vision Services” (24.9%); “Speech Therapy” (22.4%); “Nutritional Services” (17.1%); or, “Mental Health Services” (15.3%).

#### Unmet Needs for Services for Children under Age Five

All of the respondents who needed services for their children under the age of five actually received those services.

Satisfaction with Services for Children under Age Five

Table 9 presents the results on level of satisfaction with services for children under the age of five. The results in this table are calculated only for those respondents who indicate that they have used the service.

Table 9: Level of Satisfaction with Children’s Services

Services	Very Satisfied	Somewhat Satisfied	Not Satisfied
Pre-Kindergarten Programs	91.2%	7.9%	0.9%
Dental Services	90.3%	8.1%	1.6%
Mental Health Services	90.0%	5.0%	5.0%
Women, Infant and Children (WIC) Program	87.2%	12.8%	0.0%
Nutritional Services	87.0%	13.0%	0.0%
Speech Therapy	84.4%	15.6%	0.0%
Child Care	84.2%	8.8%	5.3%
Vision Services	79.3%	17.2%	3.4%

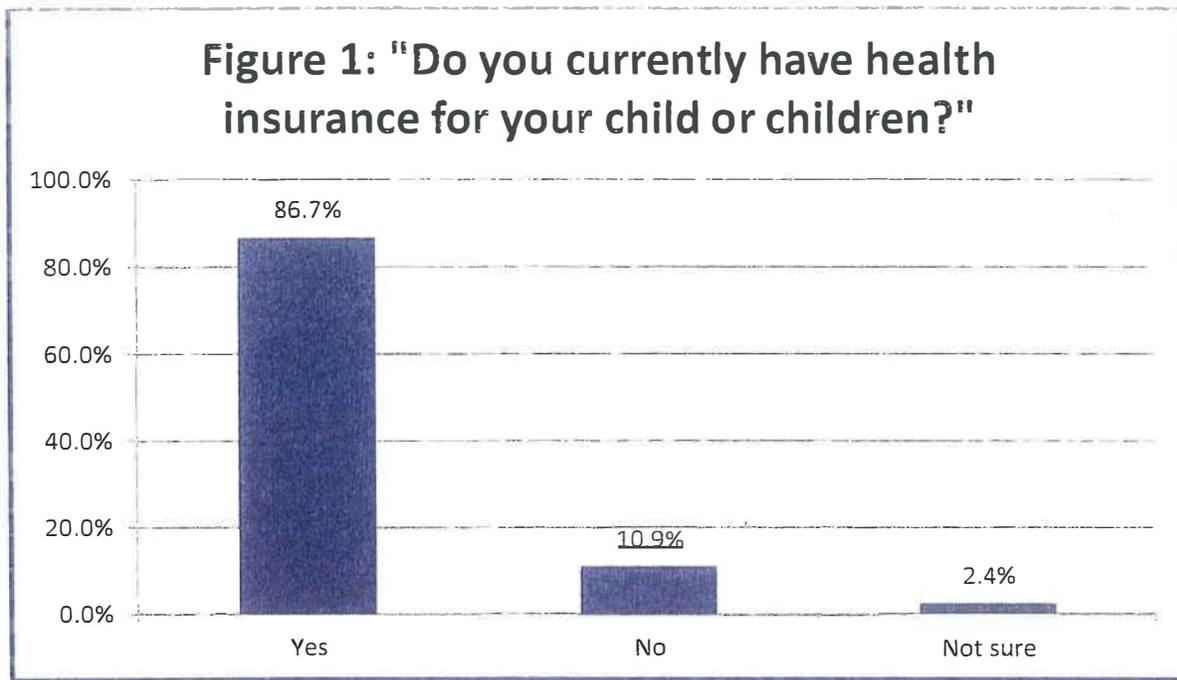
There is a very high level of satisfaction with services for children under the age of five. More than nine of ten respondents who used these services for their children were either “Very Satisfied” or “Somewhat Satisfied” with them.

The highest levels of satisfaction were for “Pre-Kindergarten Programs” (91.2%), “Dental Services” (90.3%), and “Mental Health Services” (90.0%) – at least nine in ten respondents who used these programs were “Very Satisfied.”

Respondents were least satisfied with “Child Care” they used for their children – about five percent of respondents who used these services was “Not at All Satisfied” with them.

### Health Care Insurance for Children

The survey next asked respondents if they currently have health insurance for their children. The percentage of respondents indicating that they have health insurance for their children is presented in Figure 1.



Nearly nine in ten (86.7%) respondents currently have health care insurance for their children. About one in ten (10.9%) respondents do not currently have health care insurance for their children.

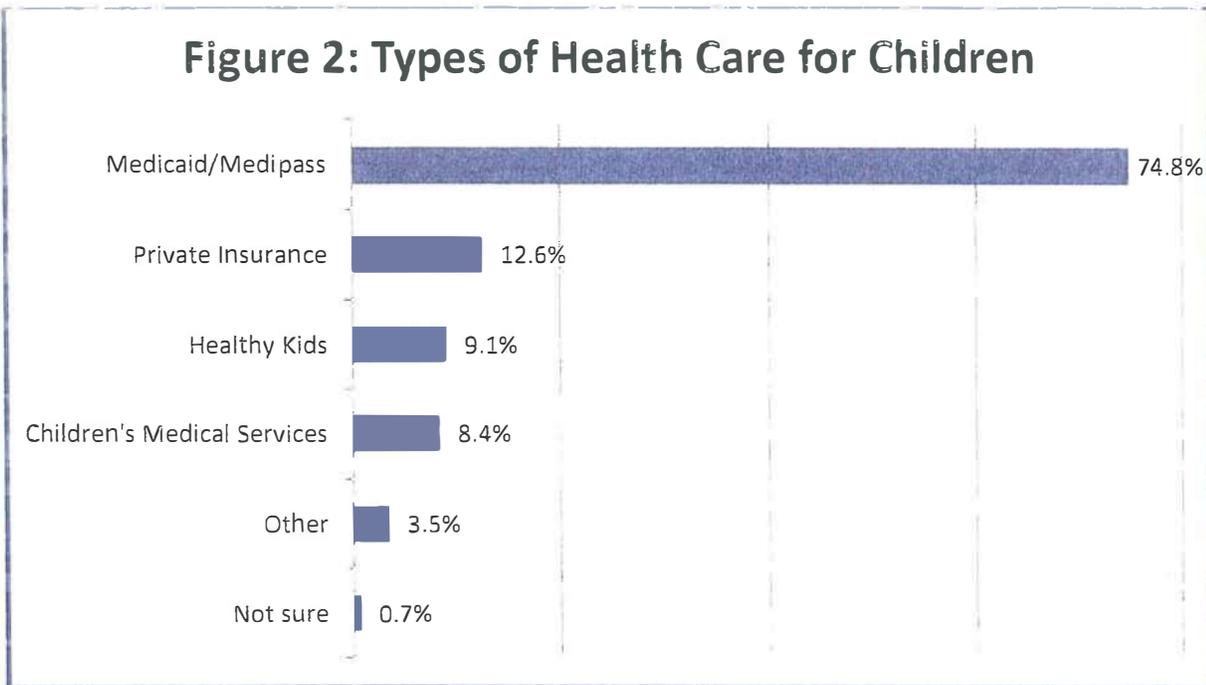
### Types of Health Insurance

The survey next asked those respondents who reported that they have health insurance for their children to indicate the type(s) of health insurance that they have. The types of health insurance provided as responses are as follows:

- Children's Medical Services;
- Private Insurance;
- Healthy Kids;
- Medicaid/Medipass;
- Other.

As respondents were allowed to choose more than one type of insurance, the total percentage could add up to more than 100 percent. The responses to this question are summarized in Figure 2.

## Figure 2: Types of Health Care for Children

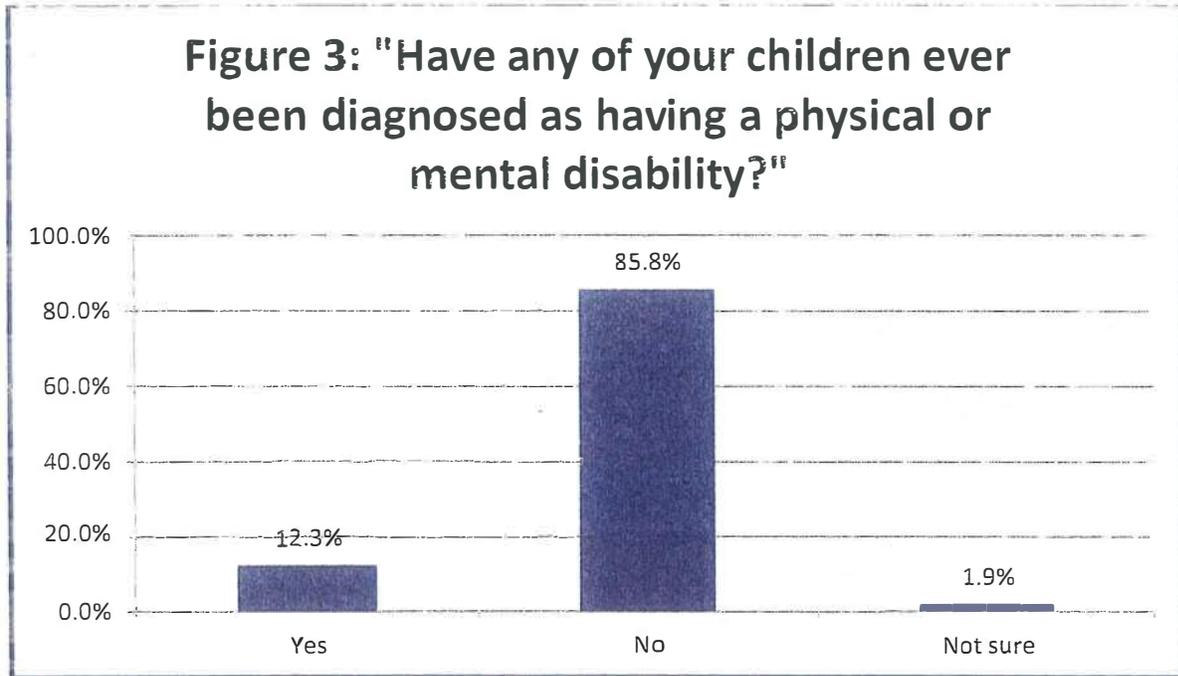


Three in four (74.8%) respondents whose children currently have health insurance indicated that they had health insurance for their children from Medicaid/Medipass. About one in eight (12.6%) of these respondents had "Private Insurance" for their children. One in ten (9.1%) of these respondents use "Healthy Kids" as a source of health insurance for their children, and a similar number (8.4%) of respondents with insurance for their children obtained health insurance from "Children's Medical Services."

In addition, five (3.5%) of these respondents indicated "Other" type of insurance they have for their children. The four who wrote in descriptions listed: "Kids Care," "Sunshine Health," "Employer BCBS," and "Florida Medicaid/Prestige."

### Diagnosis of Disability for Children in Household

The next question in this series asked respondents to indicate if any of the children in their households have ever been diagnosed with either a physical or mental disability. The responses to this question are presented in Figure 3.



About one in eight (12.3%) respondents with children under age five report having children in their households who have ever been diagnosed with either a physical or mental disability.

## Types of Disabilities

Respondents who indicated that a child in their household had been diagnosed with either a physical or mental disability were asked to list the specific type of disability. A list of the types of disabilities noted by the respondents is provided below. Respondents could note more than one disability.

Table 10: Types of Disabilities Noted

Response	Frequency
ADHD / ADD	6
Speech / Speech Delay / Speech Apraxia	3
Chronic Asthma	3
Sickle Cell Disease	2
OCD	2
Autism	2
Legally blind	1
Select Mutism	1
Heart condition (Marfan's syndrome – heart murmur)	1
Mental disability	1
Mood disorder	1
Tourette's Syndrome	1
Anxiety	1
Seizures	1
Torticollis	1
Cerebral hemorrhage & small frontal lobe hemorrhage	1
GERD	1
Right-side weakness due to stroke	1
Allergies	1

The most frequently cited disabilities that respondents' children had been diagnosed with were ADHD / ADD (n=6), various types of speech-related disabilities (n=3), asthma (n=2), Sickle Cell disease (n=2), OCD (n=2), and autism (n=2).

### Services Related to Disabilities

Respondents who indicated that a child in their household had been diagnosed with either a physical or mental disability were asked to list the specific types of services they have received related to these physical or mental disabilities. A list of the types of services noted by the respondents is provided below. Respondents could note more than one service.

Table 11: Types of Services Noted

Response	Frequency
Speech Therapy	5
Hematology	3
Occupational Therapy	2
Nemours	2
Therapy in school, home counselors, CMS	1
SSI	1
School, on job training	1
Neurology services, RSV injections for 2 yrs, pulmonology services	1
Medical	1
Bloodwork /Brain scans / Physical Therapy	1
Echoes every year, takes medicine every day	1
Doctors and many mental health services hospital	1

The most frequently cited services that respondents' children had received were speech therapy (n=5), various types of hematology (n=3), and occupational therapy (n=2). Two of the respondents noted children in their households received care at Nemours Children's Hospital.

## Demographics

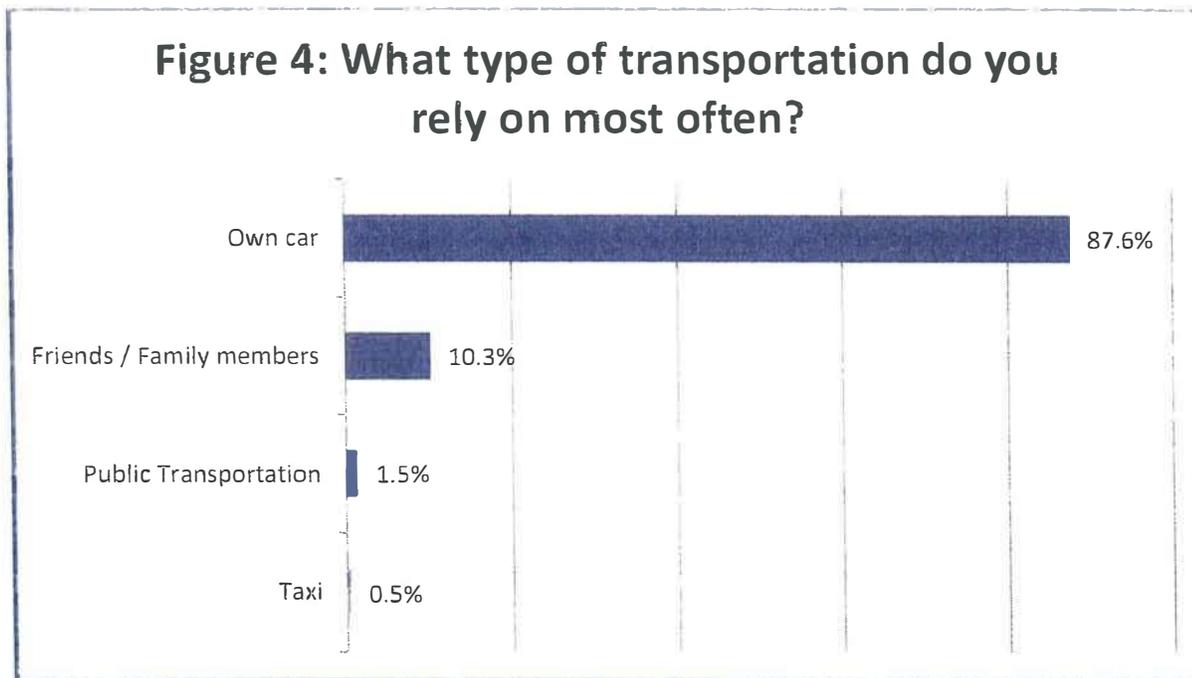
The last series of questions in the survey asked respondents to provide information on the background of their households. The questions in this section sought to obtain information on the types of transportation the respondents rely on most often, the types of housing they live in, the structure of their households, their households' total income before taxes, their employment status, their levels of education, and related information. A summary of this household background information is presented in the following section.

### Transportation Services

The first question in this section asked respondents to indicate the type of transportation that they rely on most often. The possible options for this question are as follows:

- Own car;
- Friends or family members;
- Taxi;
- Public transportation;
- Other.

The responses to this question are presented in Figure 4.



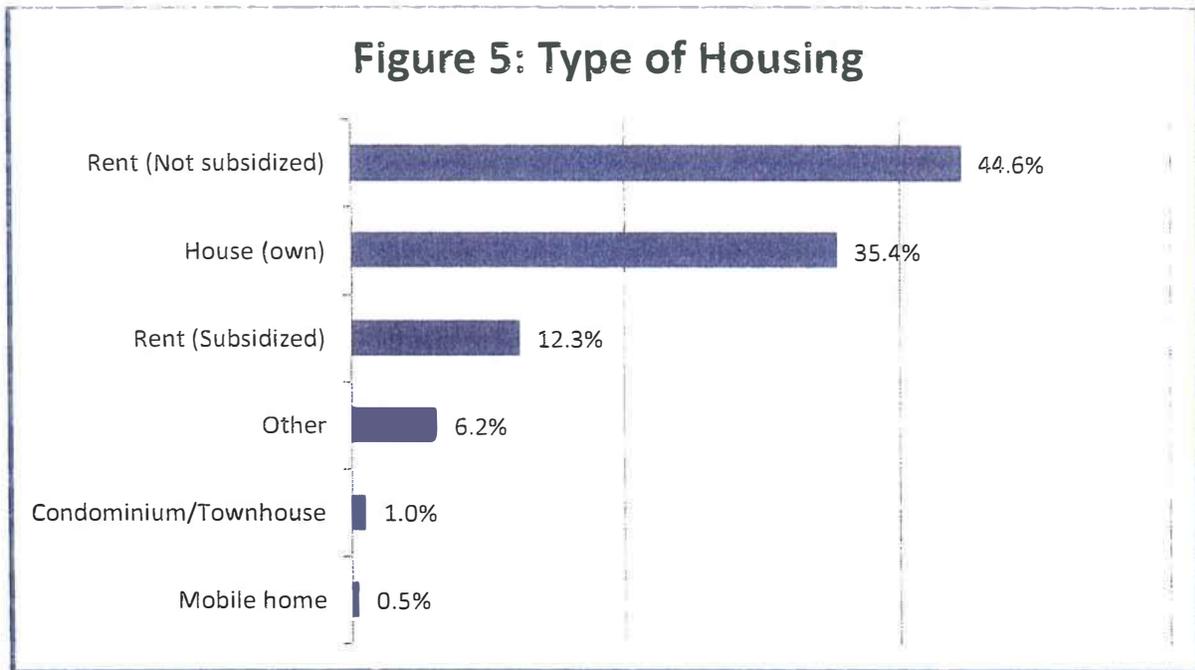
Nearly nine in ten (87.6%) respondents said they most often rely on their "Own car" for transportation, while about one in ten (10.3%) said they rely on "Friends or Family members." Three (1.5%) respondents indicated they most often rely on "Public Transportation," and one respondent said he or she relies on a "Taxi."

### Type of Housing

The next question in the section on household characteristics asked each respondent to indicate the type of housing in which he or she resides. The possible responses to this question are as follows:

- House (own);
- Condominium/Townhouse;
- Rent Apartment/House (not subsidized);
- Manufactured Housing (Mobile Home);
- Rent Apartment/House (Section 8, subsidized);
- Other.

The responses to this question are presented in Figure 5.



More than two in five (44.6%) respondents said they live in an apartment or house that they rent without subsidies. About one in three (35.4%) respondents said they live in a house that they own. One in eight (12.3%) respondents indicated living in an apartment or house that they rent with subsidies (such as Section 8 vouchers). Fewer than one in ten respondents said they live in manufactured housing/mobile homes (0.5%) or a condominium/townhouse (1.0%).

In addition, six percent of respondents provided "Other" responses, which appear below.

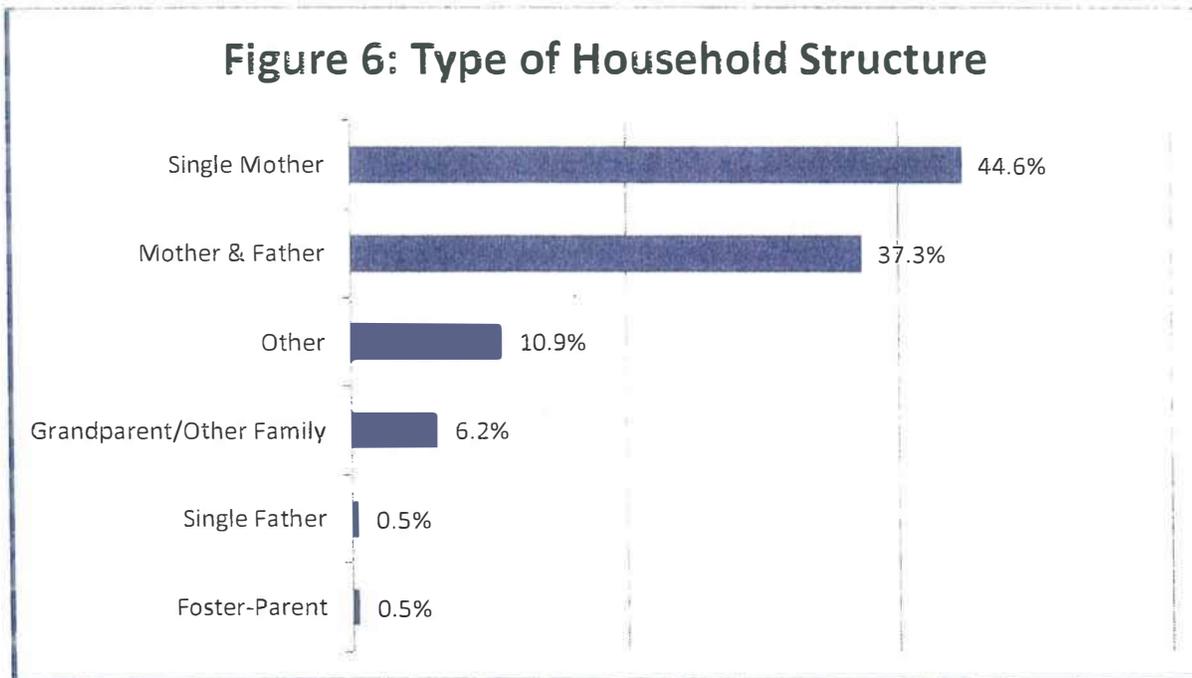
- Homeless
- 1976 Dodge minivan
- Live with sister (n=2)
- Parents
- Casa de familiares (family home)

### Household Structure

The next question in this section asked the survey respondents to identify the types of households in which they live. The possible responses to this question included the following:

- Single mother household;
- Single father household;
- Mother and father household;
- Foster-parent household;
- Grandparent/other family household;
- Other type of household.

The results of this question are presented in Figure 6.



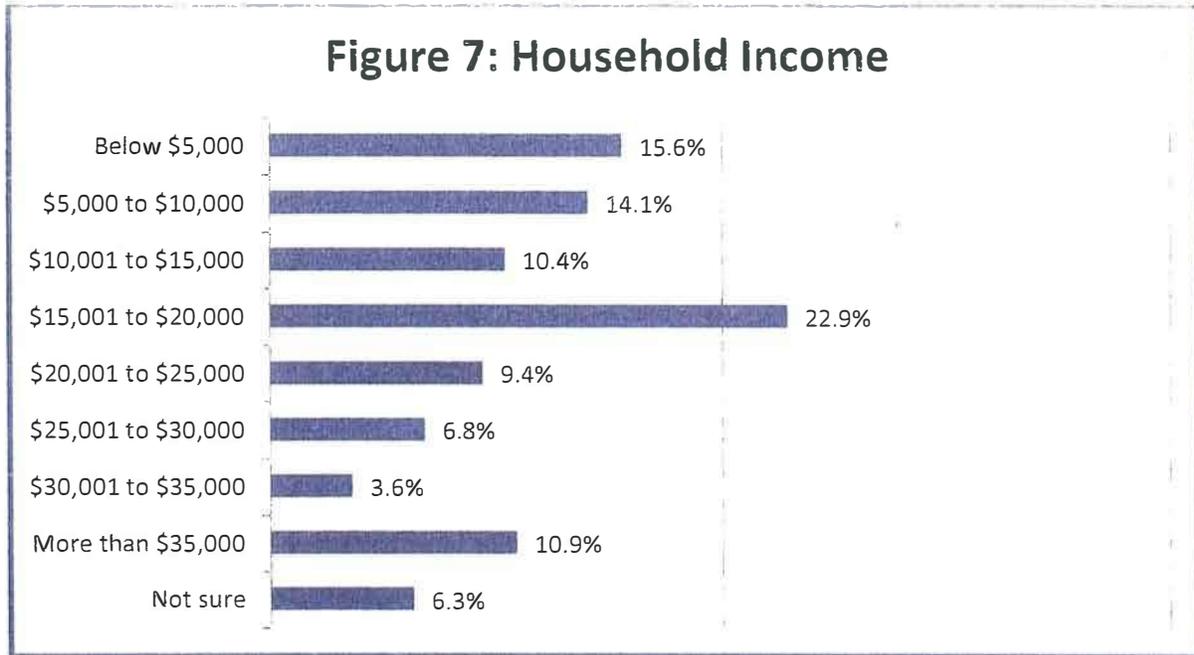
More than two in five (44.6%) of the respondents live in a “Single mother household.” Nearly two in five (37.3%) respondents said they live in a “Mother and father household.” Fewer than one in ten respondents said they live in a household with a grandparent or other family member as head of household (6.2%), a “Single father household” (0.5%), or “Foster-parent” household (0.5%). In addition, one in ten (10.9%) respondents noted “Other” types of households. These responses appear below.

#### “Other” Types of Households

Response	Frequency
Single person household (single, single – no children, divorced male, widow)	7
Couple, no children (married or cohabitating)	3
Married but separated	2
Mother and partner (“2 moms”)	1
Extended family (adult with nephew)	1
Homeless	1

## Household Income

The survey also asked respondents to indicate their households' total income before taxes for the previous year. The possible responses to this question are income categories with the first category being "Below \$5,000." The other response categories range from \$5,000 to \$35,000, in increments of \$5,000. The final, and highest, category is "Above \$35,000." The results of this question are provided in Figure 7.

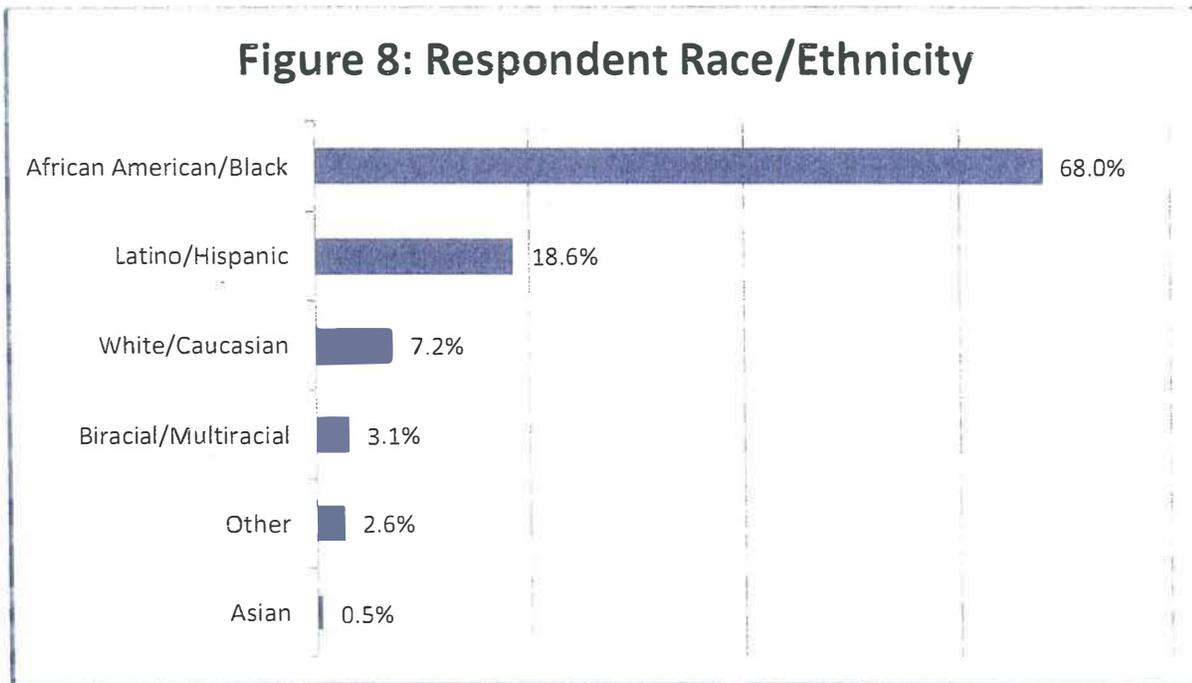


About one in six (15.6%) respondents reported a total household income before taxes below \$5,000, and a similar number (14.1%) reported a household income between \$5,000 and \$10,000. One in ten (10.4%) respondents cited a household income between \$10,001 and \$15,000. About one in five (22.9%) respondents indicated a household income between \$15,001 and \$20,000.

Fewer than one in ten respondents reported a household income: between \$20,001 and \$25,000 (9.4%); between \$25,001 and \$30,000 (6.8%); or, between \$30,001 and \$35,000 (3.6%). One in ten respondents (10.9%) said their income was more than \$35,000.

## Respondent Race/Ethnicity

The survey also asked each respondent to indicate his or her race or ethnicity. The responses to this question are presented in Figure 8.



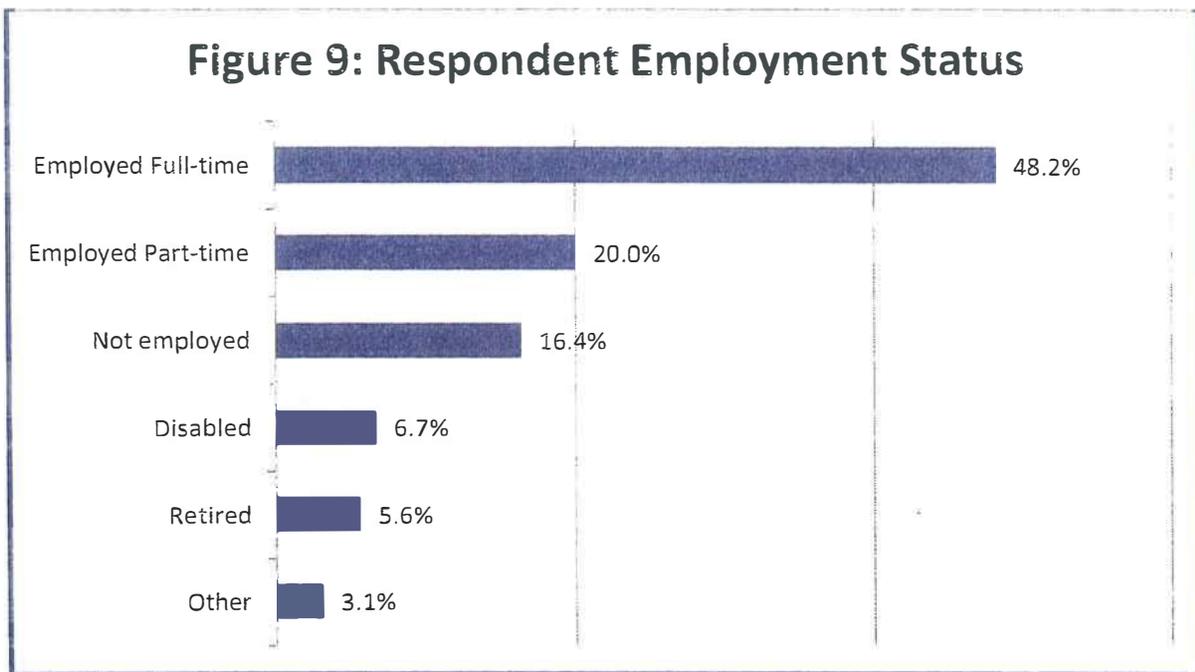
About two in three (68.0%) respondents said they are “African American/Black.” About one in ten (7.2%) respondents said they are “White/Caucasian,” and about one in five (18.6%) respondents indicated they are “Latino/Hispanic.” Fewer than one in ten respondents indicated they are “Biracial/Multiracial” (3.1%) or “Asian” (0.5%). In addition, five respondents indicated an “Other” racial/ethnic group but did not specify this race/ethnicity.

## Employment Status

The next question in the survey asked each respondent to indicate his or her employment status. The possible responses to this question are as follows:

- Employed full-time;
- Disabled;
- Not employed;
- Employed part-time;
- Retired;
- Other.

The results of this question are presented in Figure 9.



Nearly half (48.2%) of the respondents are “Employed full-time,” while one in five (20.0%) are “Employed part-time.” About one in six (16.4%) respondents said they are “Not employed.” Fewer than one in ten respondents indicated that they are either “Disabled” (6.7%) or “Retired” (5.6%).

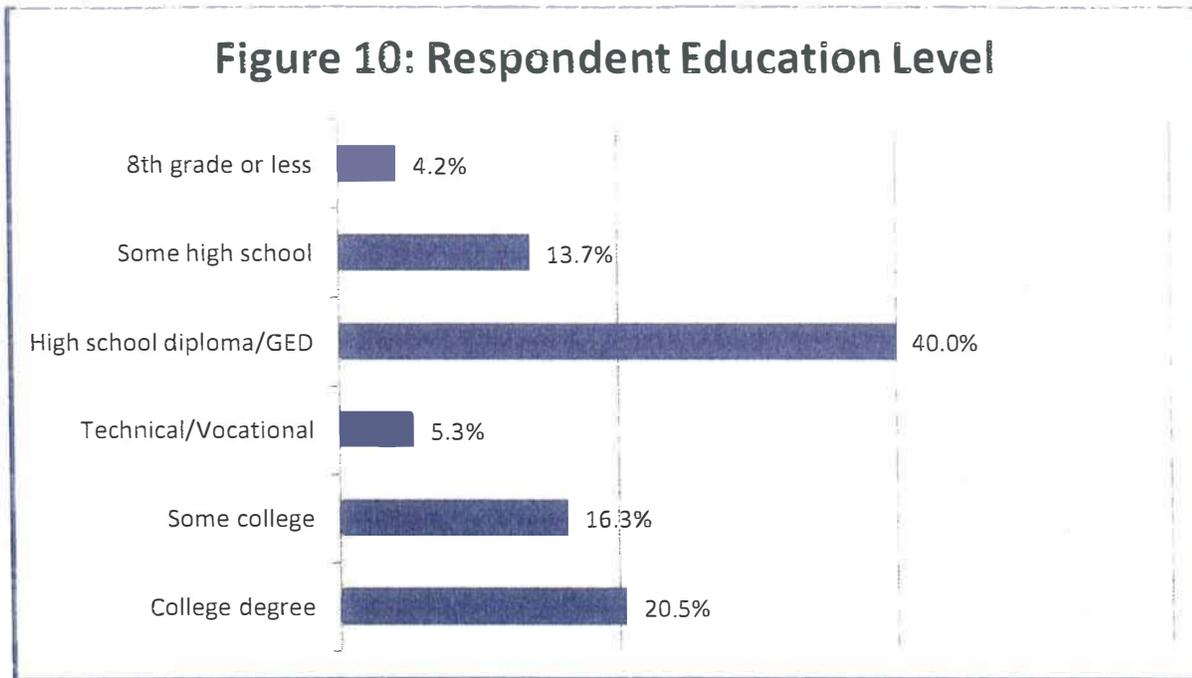
In addition, six (3.1%) respondents indicated “Other” employment situations: two said they are students, one said he or she is a “homemaker,” and one said he or she is laid-off for a month (two did not respond).

## Education Level

The next question in the survey asked each respondent to indicate the highest level of education of the adult head(s) of the household. The possible responses to this question are as follows:

- 8<sup>th</sup> grade or less;
- Some High School;
- High School Graduate;
- Technical/Vocational;
- Some College;
- College Degree.

The results of this question are presented in Figure 10.



Two in five (40.0%) respondents indicated they have a high school diploma or GED certificate, and about one in eight (13.7%) said they had some high school education but had not graduated from high school. One in six (16.3%) respondents said they had some college, and one in five (20.5%) said they have a college degree.

### Number of People in Household

This question asked the respondents to indicate the total number of people in their households. The results for this question are shown in Table 12.

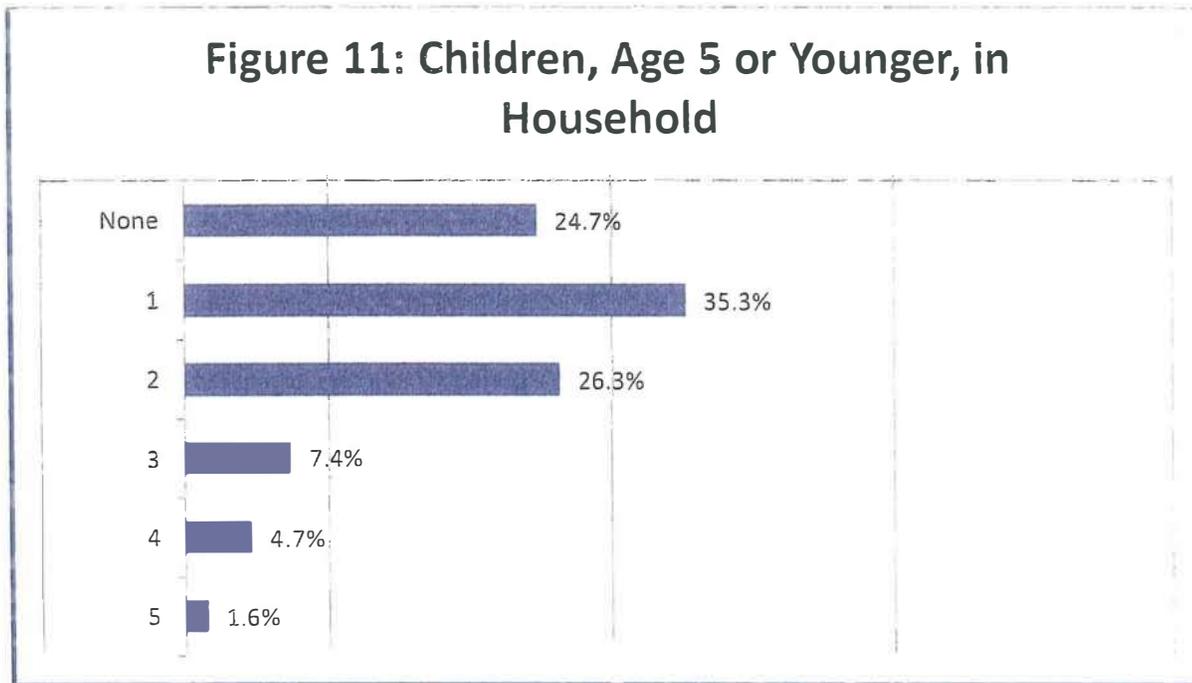
Table 12: Total Number of People in Household

Number of People in Household	% Respondents (N=189)
1	6.9%
2	15.3%
3	21.7%
4	20.6%
5	17.5%
6	10.1%
7	6.3%
8	1.6%

Fewer than one in ten (6.9%) respondents said they live alone. About one in six (15.3%) respondents indicated they live in households that have two people. About one in five (21.7%) respondents live in households that have three people and a similar number (20.6%) live in four-person households. About one in six (17.5%) respondents live in five-person households. About one in five (18.0%) respondents live in households with six or more people.

### Number of Children, Age 5 or Younger, in Household

The first part of this question asked respondents to indicate the number of children in their households that are age five or younger. The number of children in the respondent-households is presented in Figure 11.



One in four (24.7%) respondents indicated that no children, age five or younger, live in their household. About one in three (35.3%) respondents said that one child, age five or younger, lives in their household. About one in four (26.3%) respondents indicated that two children, age five or younger, live in their households. Fewer than one in ten respondents said three (7.4%), four (4.7%), or five (1.6%) children, age five or younger live in their households.

### Children by Age

The second component of this question asked respondents with children, age five or younger, in their households to indicate the ages of each child. The distribution of children by age is presented in Table 13.

Table 13: Children by Age

Age of Children in Household	Total Number	%(n=212)
Less than 1	19	9.0%
1	29	13.7%
2	34	16.0%
3	45	21.2%
4	64	30.2%
5	21	9.9%

Respondents with children age five and younger (n=143) provided ages for a total of 212 children. Of these children, about one in five (22.7%) were one-year old or younger, and about one in six (16.0%) were two-years-old. About one in five (21.2%) of these children were three-years-old, and nearly one in three (30.2%) were four-years-old. One in ten (9.9%) were five-years-old.

### Language

Respondents were given the option to complete the survey in Spanish. Of the 200 completions, 10 were completed in Spanish.

## Zip Code

The final question in the survey asked respondents to provide their zip codes. Respondent zip codes appear in Table 14.

Table 14: Respondent Zip Code

	Frequency	% (N=194)
32726	1	0.5
32771	2	1
32808	1	0.5
33805	5	2.6
33809	1	0.5
33812	2	1
33813	1	0.5
33815	1	0.5
33830	2	1
33836	1	0.5
33837	1	0.5
33838	1	0.5
33841	1	0.5
33843	8	4.1
33853	6	3.1
33860	1	0.5
33870	1	0.5
33880	2	1
33881	7	3.6
33884	1	0.5
33898	2	1
34746	1	0.5
34945	3	1.5
34946	10	5.2
34947	26	13.4
34948	1	0.5
34950	31	16
34951	3	1.5
34952	4	2.1
34953	15	7.7
34979	2	1
34981	7	3.6
34982	29	14.9
34983	10	5.2
34984	3	1.5
34986	1	0.5



## ALPI CORPORATE OFFICE - Program/Services Directory

(Lake Alfred, Winter Haven, Deland, Avon Park )

800-330-3491      863-956-3492      863-956-0349      863-956-1348  
 863-956-3491      863-956-4478      863-956-3764      863-956-4938

### FAX NUMBERS

863-956-3357  
 863-837-1001 (LIHEAP)

### CONF. ROOM

863-956-0147

### APPOINTMENT LINE

863-247-3001

### ADMINISTRATION & OPERATIONS

Dobison, Arlene (CEO)	EXT. 206
Crespo, Maria	204
Johnson, Marnita	200
Vacant	234
Vacant	228
Breakroom	214
Conference Room	216

### BUDGET & FINANCE

Gniewek, Dennis ( <i>Director</i> )	210
Mechling, Timothy	208
Freeman, Lisa	207
Rivera, Maribel	209
Robinson, Lynda	211

### HUMAN RESOURCES

Garrett, Yolanda ( <i>Director</i> )	202
Alicea, Marta	203

### CHILD DEVELOPMENT & FAMILY SERVICES

Vacant	215
Buford, Sarah	231
Vacant	233
Smith, Teri	238
Vacant	237

### COMMUNITY & ECONOMIC DEVELOPMENT

Miller, Albert ( <i>Division Director</i> )	212
MacDougall, Dorothy	201

### COMMUNITY SERVICES

Burnham, Cheryl ( <i>Senior Manager</i> )	224
Martinez, Charles	219
Vacant	220
Vacant	221
Rock, Shondi	222
Creech, Michelle	223
DeLeon, Amaryllis	232
Gilberry, Juliet (FV CDC)	863-229-7346
Ramirez, Jose (FV CDC)	863-299-3173
Aaliah, Bilal (FV CDC)	863-229-7322
Scott, Phyllis (FV CDC)	863-268-4742
Baker, Katrina (Highlands Co.)	863-657-0503
Edwards, Deandra (Highlands Co.)	863-657-0503
Silva, Melissa (B Street - Lake Wales)	863-589-5211
Clarke, Marline (Admin, Ft. Pierce)	772-466-2631 (25)

### ECONOMIC SERVICES

Lee-Yang, PaHoua ( <i>Senior Manager</i> )	218
Beauville, Marlene	243
Stickney, Fred (New Horizon)	863-875-5585
Taylor, Grenea (New Horizon)	863-268-8205
Ivey, Michelle (New Horizon)	863-229-7354
Vacant (Family Fundamentals)	863-686-1221 (259)
Harris, Sophie (Highlands Co.)	863-657-0503
Jones, Toni (Highlands Co.)	863-657-0503
Astorga, Patricia (Hendry Co.)	863-946-0298
Lisa Brinkerhoff (ATEC - Volusia Co.)	386-624-6912



**Eastern Administrative Office Phone Directory**

Front Desk	<b>10</b>	Myrna Rodriguez	<b>11</b>	Mariel Margarin	<b>12</b>
Administrative Assistant	<b>13</b>	Diana G. Contreras	<b>14</b>	Deputy Director	<b>15</b>
Alisa Thornton	<b>16</b>	Lisa Michelle Alkire	<b>17</b>	Arlene Dobison	<b>18</b>
Jewel Whitehead	<b>19</b>	Anna Holmes	<b>20</b>	Donita Brunson	<b>21</b>
Iris Rivera	<b>22</b>	Germaine Louis	<b>24</b>	Marline Clarke	<b>25</b>
Lisandra Concepcion	<b>27</b>	William Hopkins	<b>28</b>	Ana Cendejas	<b>30</b>
FSW	<b>31</b>	CAT Program	<b>32</b>	Latonya Robinson	<b>36</b>
FSSC	<b>37</b>	Mary Louise Dixon	<b>38</b>		
<p align="center"><b>ALPI Administrative Office</b>  <b>Head Start/Early Head Start</b>  <i>Myrna Rodriguez, POD</i>            2202 Avenue Q, Fort Pierce, FL 34950            (772) 466-2631 - Toll Free (800) 791-3099            Fax Upstairs (772) 464-3035 - Fax Downstairs (772) 466-3886</p>		<p align="center"><b>ALPI Computer Assisted Tutorial (CAT) Program</b>            2202 Avenue Q            Fort Pierce, FL 34950  <b>(772) 466-2631</b>            Fax (772) 466-3886</p>		<p align="center"><b>Learning Tree Academy</b>  <i>Elsie Salter, Owner</i>            2808 Avenue D            Fort Pierce, FL 34947  <b>(772) 464-2988</b>            Fax (772) 464-0155</p>	
<p align="center"><b>ALPI Central Office</b>            300 Lynchburg Road            Lake Alfred, FL 33850  <b>(863) 956-3491</b>  <b>Toll Free (800) 330-3491</b>            Fax (863) 956-3357</p>		<p align="center"><b>ALPI Frostproof CDC</b>            701 Hopson Road            Frostproof, FL 33843  <b>(863) 635-3396</b>            Fax (863) 635-0185</p>		<p align="center"><b>Jumpstart Dev. Center</b>  <i>Kiuwana Shipman</i>            1068 Pine Avenue            Lake Wales, FL 33853  <b>(863) 679-3250</b>            Fax (863) 679-3253</p>	
<p><b>ALPI Child Development &amp; Family Services Center</b>            198 N.W. Marion Avenue            Port St. Lucie, FL 34983</p>		<p><b>CDSM – Austin Steiger</b>  <b>CDCC - Charline Celestin</b>            AA – VACANT            FSW - Juanita Deloera            FSW - Amy Nunez            FSW – Mary L. Dixon</p>		<p><b>(772) 879-4944</b>            (772) 879-4272            (772) 879-4377  <b>Fax (772) 879-4966</b></p> <p><b>(772) 343-7915</b>            (772) 343-7916  <b>Fax (772) 343-7918</b></p>	
<p><b>ALPI Francina Duval Head Start Center</b>            1035 South 27<sup>th</sup> Circle            Fort Pierce, FL 34950</p>		<p><b>CDSM - Mary Brunson</b>            AA - VACANT            FSW - VACANT</p>		<p><b>(772) 461-0398</b>            (772) 461-0891</p> <p><b>Fax (772) 461-1024</b></p>	
<p><b>ALPI Garden Terrace Head Start Center</b>            1110 North 32<sup>nd</sup> Street            Fort Pierce, FL 34950</p>		<p><b>CDSM – Carol Smith</b>            AA - Ernestia Frazier            FSW - Cynthia Thomas            FSW - VACANT</p>		<p><b>(772) 468-0300</b>            (772) 468-0210</p> <p><b>Fax (772) 468-3737</b></p>	
<p><b>ALPI George W. Truitt Family Services Center</b>            1814 North 13<sup>th</sup> Street            Fort Pierce, FL 34950</p>		<p><b>CDSM - Elnora Hall</b>            AA – VACANT            FSW - Kelcey Williams            FSW – Rachele Mirville</p>		<p><b>(772) 464-4452</b>            (772) 465-3121</p> <p><b>Fax (772) 465-1045</b></p>	
<p><b>ALPI Lincoln Park Head Start Center</b>            1400 Avenue M            Fort Pierce, FL 34950</p>		<p><b>CDSM - Glenda Johnson</b>            AA - VACANT            FSW - Rhonda McBride            FSW – April McCrary</p>		<p><b>(772) 464-6061</b>            (772) 464-7396</p> <p><b>Fax (772) 464-5349</b></p>	
<p><b>ALPI Queen Townsend Head Start Center II</b>            2202 Avenue Q            Fort Pierce, FL 34950</p>		<p><b>CDSM – Chelsea Polk</b>            AA - Sharee McBride-Coke            FSW - Cindy Thomas            FSW - Karla Toole            FSW - Gerald Lewis</p>		<p><b>(772) 429-8889</b>            (772) 429-2446</p> <p><b>(772) 464-7354</b>            (772) 468-0904</p> <p><b>Fax (772) 464-1341</b></p>	

# STRATEGIC PLAN FY 2020-2024

MYERS/WILSON ASSOCIATES, LLC 18726 Chopin Drive, Lutz, Florida 33558

July 23, 2020

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## Leadership Message

Beginning in March of 2020, our Country, State and Local residents found themselves witnessing unprecedented times, due to the COVID-19 Pandemic, and racial unrest around this nation. The Pandemic has caused havoc in Florida and across America with millions of jobs lost due to Stay-at-home orders. As an essential organization, The Agricultural and Labor Program Inc., (The ALPI) is transitioning, in a manner of how we conduct business, with the inclusion of on-line applications. Due to the safety concerns, and to reach more clients affected by COVID-19 we find that our mission has to be driven through technology.

The ALPI's vision, mission, and core values are built on the premise that we make lives better by assisting the disadvantaged, disenfranchised, children, families, and farmworkers in achieving and maintaining family stability and economic self-sufficiency.

With over fifty-two years of providing quality services, The ALPI has not wavered from this commitment, and never will. This pandemic has altered our way of life including the way we work and socialize. We have faced adversity in the past and will be confronted with new difficulties in the future. However, let's remember we are all in this together and we value the clients that we serve.

In December, our organization embarked upon a project to review and write The ALPI's new five-year strategic plan. During the planning process, we made a concerted effort to ensure input from all clients that we serve, and the staff as internal resources. We found our focus to be aimed at five key areas:

- Creating additional funding sources by establishing a low-income designated credit union, a foundation, a charter school, and/or a thrift store;
- Improving programs for childcare and adult services;
- Strengthening community partnerships;
- Increasing The ALPI's brand awareness; and
- Enhancing The ALPI's technology and scale operations.

This strategic plan provides the framework for the Agency's goals and objectives that will help to guide our work in the coming years. As we continue to assist and empower individuals to achieve social and economic well-being, in partnership with our community, these initiatives will direct our Agency's path to assist those with less, and their families, to achieve economic security.

We would like to extend a sincere thank you to all who participated in this strategic planning process. This plan required much dedication and insight, and the final results reflect the hard work put into the process. Our gratitude also goes to The ALPI's staff, volunteers, community partners, stakeholders and this great Board of Directors, without them none of this work would be possible.

Sincerely,



Arlene Dobison, CCAP, NCRI  
Chief Executive Officer



William Holt  
The ALPI Board Chairperson

## Introduction

### Background

The primary purpose of this strategic plan is to identify and initiate key efforts to improve The ALPI. This typically involves a review of The ALPI's purpose, current condition, and where the organization wants to go; identification of programs, services, or processes, that are working or not working well; and determining areas that should be addressed to move The ALPI forward.

Overall, the role of this strategic plan will help manage the "change" occurring within The ALPI aimed at moving the organization towards its vision.

### The Purpose

Ultimately, strategic planning is a systematic process that helps set an ambition for The ALPI's future and determine how best to achieve it. Its primary focus is to connect three key areas:

- the **mission** - defining The ALPI purpose
- the **vision** – describing what The ALPI wants to achieve
- the **plan** – outlining how The ALPI will achieve its ultimate goals

It requires stepping back from the day-to-day operations and articulating where The ALPI is heading, by setting long-term goals, objectives, and priorities for the future. More importantly, it allows The ALPI to ask and answer the following:

- Where are you now?
- Where do you want your organization to be?
- How will you get there?
- How will you know if you have succeeded?

### Expected Outcome

The overall focus of the strategic plan is to document the planning process. The vision and mission statements are reviewed, assessed, and confirmed. Core value statements are developed and refined. Approved goals, objectives, and strategies are established that aligns to the mission and vision of the Agency. Lastly, once reviewed and satisfied by the Chief Executive Officer, the planning document is submitted to the Board for formal approval with implementation being made by the Chief Executive Officer and Management Staff.

## Overview of the Strategic Planning Process

### The Process

At the end of 2019, the Board and the Chief Executive Officer determined that the organization would benefit from external leadership for the strategic planning process. By soliciting outside consultation, this allowed all key staff members to fully participate in the planning process but also benefit from an objective voice. As a result, Myers/Wilson Associates, a human resource consulting firm, was selected to lead the Board and Staff in developing The ALPI's new five-year strategic plan.

On November 22-24, 2019, the Board, Policy Council, and Management Staff participated in an annual planning retreat. Under the direction of Myers/Wilson, the group participated in a Pre-SWOT analysis session that identified The ALPI's strengths, weaknesses, opportunities, and threats. The common themes that resulted from the Pre-SWOT analysis included the following:

### Pre-SWOT Analysis (Common Themes)

<p><b>Strengths</b></p> <ul style="list-style-type: none"> <li>• Longevity</li> <li>• Community Outreach</li> <li>• Benefits</li> <li>• Reputation</li> <li>• Staff Leadership</li> </ul>	<p><b>Weaknesses</b></p> <ul style="list-style-type: none"> <li>• Unrestricted Funds</li> <li>• Succession Planning</li> <li>• Technology</li> <li>• Communication</li> <li>• Transparency</li> </ul>
<p><b>Opportunities</b></p> <ul style="list-style-type: none"> <li>• Social Media/Marketing Community Awareness</li> <li>• Expansions</li> <li>• Strengthen Partnerships</li> <li>• Funding</li> </ul>	<p><b>Threats</b></p> <ul style="list-style-type: none"> <li>• Competition</li> <li>• Labor Force Turnover/Longevity</li> <li>• Federal Funding Instability</li> </ul>

In January 2020, the strategic planning sessions began and to date the Board and Staff have covered the following sessions:

Planning Session I – Board Members and Chief Executive Officer

- Reviewed, clarified, and refined The ALPI's vision and mission statements.
- Conducted a SWOT Analysis (Strengths, Weaknesses, Opportunities, and Threats) to assess the internal and external environment of the organization.
- Examined the commonalities of the Pre-SWOT and SWOT analyses.
- Identified key strategic goals for the Agency to pursue moving forward that addressed the findings of the SWOT and Pre-SWOT analysis.

Planning Session II – Management Staff

- Evaluated and created core values.
- Identified and formulated objectives that will be utilized towards selecting strategic goals over the next five years.

Planning Session III – Middle Management and Functional Staff

- Developed measurable strategies with specific milestones and timelines that aligned to the selected objectives.

## Vision and Mission Statement

The Board adopted a revised vision and mission statement that will serve as a guide for The ALPI's work over the next five years.

### **VISION**

To be the premier  
poverty fighting  
Community Action  
Agency in America.

### **MISSION**

To collaborate with  
community partners and  
deliver human service  
programs that empower  
the economically  
disadvantaged and  
others to be self-  
sufficient.

## Core Values and Statements

The Management team adopted the following as the Agency's core values and statements.

### Integrity

We believe in being honest, trustworthy, respectful, and ethical in our actions.

### Diversity

We recognize the conditions in which people differ create diversity of thought, ideas, perspectives, and values.

### Collaborative

We listen and evolve together, helping and supporting each other to achieve a collective goal.

### Accountability

We honor commitments to our clients and to one another.

### Results Oriented

We will focus on delivering the best results for our clients, which contributes to the success of the Agency.



## Strategic Planning Participants

Below is a list of participants involved in each of the planning sessions described in the previous section.

**Chief Executive Officer** – Arlene Dobison, CCAP, NCRI

### Board Members

William Holt <i>Chairperson</i>	Glenda Jones
Stacy Campbell-Domineck <i>Vice Chairperson</i>	N’Kosi Jones
Shelia Dixon <i>Secretary</i>	Chester McNorton
Patricia Gamble <i>Treasurer</i>	Vernon McQueen
Katie Clarke	Yolanda Robinson
Marjorie Gaskin	Tonmiel Rodriguez, Esq.
Annie Robinson	Kimberly Ross
Brenda Gray	David Rucker
Josephine Howard	Timothy Stanley
Kim Johnson	Ruby Willix
Annette Jones	Johnathan Thiele, Esq

### Management Staff

Al Miller <i>Community Services &amp; Economic Development/DD</i>	Aletta Stroder <i>Program Operations (Polk County)</i>
Twila Smith <i>Operations &amp; Quality Control</i>	Caroline W Looney <i>Child Development &amp; Family services/DD</i>
Dennis Gniewek <i>Finance</i>	Donita Brunson <i>Family &amp; Community Partnership Manager</i>
Yolanda Garrett <i>Human Resources</i>	Alisa Thornton <i>Early Childhood Development Education Services Manager</i>
Cheryl Burnham <i>LIHEAP/Community Services</i>	Lisa Self <i>Quality Assurance/Contract Compliance</i>
Pa Houa Lee-Yang <i>CSBG/Economic Services</i>	Tim Mechling <i>Senior Accountant II</i>
Myrna Rodriguez <i>Program Operations (St. Lucie County)</i>	

**Middle Management & Functional Staff**

Sheneka Davis <i>Child Development Services Manager</i>	Anna Holmes <i>Family Support Services Coordinator</i>
Glenda Johnson <i>Child Development Services Manager</i>	Lisandra Conception <i>Family Support Services Coordinator</i>
Mary Brunson <i>Child Development Services Manager</i>	Lisa Pough <i>Family Support Services Coordinator</i>
Sandra Monroe <i>Child Development Services Manager</i>	Cheryl Filipowicz <i>Child Development Center Coordinator</i>
Crystal Dames <i>Child Development Services Manager</i>	Carol Smith <i>Child Development Center Coordinator</i>
Christine Wilson <i>Child Development Services Manager</i>	Charline Celestin <i>Child Development Center Coordinator</i>
Iris Rivera <i>Health Services Manager</i>	Teri Smith <i>Food Services Coordinator</i>
Avea Ezell <i>Human Resource Generalist</i>	Emily Tiver <i>Early Childhood Education Coordinator (St. Lucie County)</i>
Jewel Whitehead <i>Family Support Services Coordinator</i>	William Hopkins <i>Transportation Coordinator</i>
Germain Louis <i>Family Support Services Coordinator</i>	

## Guiding Principles

### ROMA Next Generation & Theory of Change (TOC)

ROMA provided a framework for continuous growth and improvement for community action agencies across the nation, touching on all levels of need: Family, Agency and Community. ROMA Next Generation is the expansion of the ROMA system introduced in 1994. ROMA Next Generation provides the context for continuous quality improvement which allows the network to effectively access and communicate performance to stakeholders. It switches the emphasis from a “compliance” focus to “continuous learning” focus.

The goals outlined in the strategic plan are consistent and align with the National Community Action Network Theory of Change (**Appendix A**) and the three core goals:

- Goal 1:** Individuals and families with low incomes are stable and achieve economic security.
- Goal 2:** Communities where people with low incomes live are healthy and offer economic opportunity.
- Goal 3:** People with low incomes are engaged and active in building opportunities in communities.

To further analyze the data and establish a framework to clearly articulate how agencies identify needs, what outcomes they expect to achieve, and what strategies will produce the outcomes, the Local Community Action Theory of Change model (**Appendix B**) was utilized. This model will serve as a foundation for all work of future initiatives and identify indicators and measures that will allow agencies to observe and report progress.

## Summary of Assessments

### Community Assessment Survey

A community assessment report was developed for The ALPI by the Florida Survey Research Center – University of Florida on November 13, 2018. A survey was conducted jointly by Florida Survey Research Center (FSRC) and The ALPI. FSRC provided The ALPI with 3000 survey packets to distribute to low-income families within The ALPI service area. The assessment revealed the following top unmet needs, which are identified within the categories of Adult Services and Child Care Services that correlates to the National Community Action Goal #1 and Goal #3.

Adult Services (Unmet Needs):

1. Home Ownership Programs
2. Financial Credit Counseling
3. Adult Health Care Insurance

Child Care Services (Unmet Needs):

1. Childcare services in the afternoon after 5:30 p.m.
2. Childcare services on the weekends

### SWOT Analysis

While a Pre-SWOT Analysis was initially performed during the annual retreat, the Board and Chief Executive Officer reassessed The ALPI's strengths and weaknesses and its opportunities and threats. In doing so, the group finalized the SWOT analysis while incorporating the findings of the Pre-SWOT analysis. Below are the results of the SWOT analysis performed by the Board.

<p><b>Strengths</b></p> <ul style="list-style-type: none"> <li>• Board/Staff Commitment</li> <li>• Planning</li> <li>• Staff Leadership</li> <li>• Training</li> <li>• Community Outreach</li> <li>• Benefits</li> <li>• Reputation</li> </ul>	<p><b>Weaknesses</b></p> <ul style="list-style-type: none"> <li>• Marketing</li> <li>• Communication</li> <li>• Lack of Transparency</li> <li>• Unrestricted Funds</li> <li>• Succession Planning</li> <li>• Technology</li> </ul>
<p><b>Opportunities</b></p> <ul style="list-style-type: none"> <li>• Expansions</li> <li>• Strengthen Partnerships</li> <li>• Community Awareness</li> <li>• Funding</li> </ul>	<p><b>Threats</b></p> <ul style="list-style-type: none"> <li>• Legal/Lawsuits</li> <li>• Funding Instability</li> <li>• Competition</li> <li>• Long-term Labor Force Turnover/Longevity</li> </ul>

## Strategic Issues and Priorities

The findings from the Community Assessment Survey and the SWOT analysis along with Board participation were analyzed to determine the strategic issues The ALPI is facing. As a result, five strategic priorities were developed that addresses emerging issues The ALPI will potentially face over the next five years. The strategic issues and priorities are defined below.

### Strategic Issues

- Limited unrestricted funding sources
- Agency marketing and branding opportunities
- Ability to expand opportunities and resources through community partnerships
- Limited modernized technology within the Agency
- Barriers for continuous employment to achieve livable wages
- Financial well-being and awareness for low income households
- Competition from public school systems that share similar programs
- Engagement and professional development opportunities for staff retention

### Top Five Strategic Priorities



## Strategic Goals

With the above priorities being in the forefront, the Board approved the strategic goals as stated below.



Once the vision and mission statements have been created along with approved goals, the next step is to develop a series of statements specifying how the mission will be utilized to achieve the vision:

- **Goals** – Goals are one or more ways to use the mission statement to achieve the vision statement. Although an organization will have just one vision statement and one mission statement, it may have several goals.
- **Objectives** – These are general statements of what needs to be accomplished to implement a goal.
- **Strategies** – Strategies turns an objective’s general statement of what is to be accomplished into what is going to be achieved.
- **Action Plans** – *These are specific implementation plans of how you will achieve a strategy. (Action plans were only incorporated when further analyzing the establishment of a charter school, credit union, foundation, and thrift store for Goal 2)*
- **Outcomes** – Outcomes describe the change or the results of the objectives and strategies.

The next few pages outline the Five-Year Strategic Plan for The ALPI. It identifies the five strategic goals with objectives, strategies, and outcomes which are aligned with the Strategic Priorities and the three related National Community Action Goals. In addition, the outcomes have been categorized into Family, Agency, or Community, which addresses the National Community Action Goals. As a quick reference, the goals and outcomes are illustrated in **Appendix C**.

# STRATEGIC PLAN

## FY 2020-2024



## **Goal 1: Broaden Partnerships with Human Service Entities**

### *National Goals:*

- #3 - *People with low incomes are engaged and active in building opportunities in communities.*

### *Strategic Priorities:*

- #3 - *Strengthen Community Partnerships*

**Objective 1.1:** Provide job placement services for adults.

### **Strategies:**

- Work with community partners to provide mentorship, apprenticeship, or on the job training.
- Expand job training and educational opportunities.

### **Outcomes:**

- Clients receive certification in high demand occupations. (Community)
- Clients become employed by obtaining full-time positions. (Community)

**Objective 1.2:** Supplement food supply for low income families.

### **Strategies:**

- Develop partnerships with local food bank agencies in each service area.

### **Outcomes:**

- Children and Families nutrition is improved. (Family)

## Goal 2: Increase Service and Funding Capacity

### National Goals:

- #1 - *Individuals and families with low incomes are stable and achieve economic security.*
- #2 - *Communities where people with low incomes live are healthy and offer economic opportunity.*

### Strategic Priorities:

- #1 – *Develop Opportunities for Unrestricted Funds*

**Objective 2.1:** Create additional service opportunities.

### Strategies:

- Explore the feasibility of a charter school.
- Identify health care assistance and transportation.
- Become a contractor with local agencies to provide insurance enrollments to families.

### Outcomes:

- Establish a charter school. (Community)
- Clients obtain transportation for medication and doctor's appointments. (Community)
- Establish an on-site health insurance certified agency within each service area. (Agency)

**Objective 2.2:** Create additional funding opportunities.

### Strategies:

- Explore the feasibility of a low-income designated credit union.
- Explore the feasibility of a foundation.
- Explore the feasibility of a thrift store.

### Outcomes:

- Establish a low-income designated credit union. (Agency)
- Establish a foundation. (Agency)
- Establish a thrift store. (Agency)

The following provides additional details when exploring a charter school, a credit union, a foundation, and a thrift store for Goal 2.

**Strategies 2.1.1:**

- Appoint a committee to explore the feasibility of a **charter school**.

**Action Plans:**

- The Board and Chief Executive Officer will appoint a committee with a minimum of seven members, and additional ad-hoc committees as needed.
- Committee or ad-hoc committees will gather the following information:
  - Recommendations for potential board members.
  - Demographics for the charter school.
  - Program curriculum for the charter school.
  - Financial and marketing plan.
  - Potential school sites.
- Appointed committee or ad-hoc committee will report/present the findings to the Chief Executive Officer within six months of being appointed.
- Chief Executive Officer will present the option to the Board of Directors for approval to move forward with establishing a charter school.

**Strategies 2.2.1:**

- Explore the feasibility of a low-income designated **credit union**.

**Action Plans:**

- The Board and Chief Executive Officer will appoint a committee with a minimum of seven. Individuals do not all need financial experience, but a financial background will help in establishing the credit union.
- Committee will determine the need and target customer base by:
  - Determining the common bond for membership. Credit unions are limited in the type of customers they can seek. A common bond is required for a charter and can be based on location, place of employment or industry, religious community, or other associations.
  - Surveying potential credit union members. Establish if there is enough interest in the common bond group to establish a credit union. Learn the financial needs of the membership and use that as a guide for establishing the credit union.
  - Financial and marketing plan.
  - Potential credit union sites.
- Appointed committee will report/present the committee findings to the Chief Executive Officer within six months of being appointed.
- Chief Executive Officer will present the option to the Board of Directors for approval to move forward with establishing a credit union.

**Strategies 2.2.2:**

- Explore the feasibility of a **foundation**.

**Action Plans:**

- The Board and Chief Executive Officer will appoint a committee of at least five members with no more than seven members.
- Committee will gather the following information:
  - Identify areas of interest based upon the community needs assessment and determine the specific cause or geographic regions to focus on.
  - Create a proposed foundation name to potentially incorporate.
  - Prepare document for Articles of Incorporation for approval.
  - Recommend board members and name them in the Articles of Incorporation. A minimum of at least three members are required to serve on the board of directors.
  - Document the required filing fees for incorporation.
  - Create By-Laws for approval.
  - Establish a Conflict of Interest Policy for approval.
  - Establish Funding Guidelines for approval – funding guidelines can include selection of grantees, application process, grant ranges, and timeframe to accept proposals.
- Appointed committee will report/present findings to Chief Executive Officer within two months of being appointed.
- Chief Executive Officer will present the option to the Board of Directors for approval to move forward with establishing a foundation.

**Strategies 2.2.3:**

- Explore the feasibility of a **thrift store**.

**Action Plans:**

- The Board and Chief Executive Officer will appoint a committee of at least five members with no more than seven members.
- Committee will gather the following information:
  - Determine the required documents, including business licenses, insurance policies, and tax account status forms.
  - Choose an existing retail location to rent, lease or have donated.
  - Sketch a basic floor plan and decide what type of merchandise you are going to sell in each area.
  - Determine the inventory to sell.
  - Determine the number of people needed to staff your thrift store.
  - Create marketing and branding materials for the grand opening of the thrift store.
- Appointed committee will report/present findings to Chief Executive Officer within two months of being appointed.
- Chief Executive Officer will present the option to the Board of Directors for approval to move forward with establishing a foundation.

### **Goal 3: Enhance Brand Identity and Marketing**

*National Goals:*

- #3 – *People with low incomes are engaged and active in building opportunities in communities.*

*Strategic Priorities:*

- #4 – *Increase Brand Awareness*

**Objective 3.1:** Strengthen communications to promote the organization’s brand.

**Strategies:**

- Enhance communications and marketing plan to strengthen presence within communities served.
- Publish additional videos that showcase programs and services to strengthen presence in communities served.
- Strengthen social media presence (Facebook, Instagram, and Twitter) to increase number of followings.
- Ensure branding and marketing collateral is assessable to employees and regional advisory councils.

**Outcomes:**

- Increase community and awareness of services the organization provides. (Agency)

**Objective 3.2:** Strengthen community outreach and education regarding range of services.

**Strategies:**

- Communicate regularly to staff about programs and services offered and any adjustments to those programs and services.
- Ensure marketing collateral utilized by regional advisory councils promotes The ALPI’s brand.
- Host an annual open house for the communities served to learn about The ALPI’s programs and services.

**Outcomes:**

- Staff can adequately communicate program and appropriate services to assist families. (Community)
- Low-income families are aware of The ALPI’s services and can communicate to other families. (Family)

## **Goal 4: Connect Community Resources to Enhance Family Services**

### *National Goals:*

- #3 – *People with low incomes are engaged and active in building opportunities in communities.*

### *Strategic Priorities:*

- #2 – *Improve Child and Adult Services Programs*

**Objective 4.1:** Promote STEM education for children and adults.

### **Strategies:**

- Train staff to achieve proper skills to become STEM certified.
- Establish STEM workshops to encourage long-term mindset for STEM careers.

### **Outcomes:**

- Staff obtain STEM Certification. (Agency)
- Children and adults improve their problem solving, critical thinking, and discovery skills leading to STEM educational opportunities and careers (Community)

**Objective 4.2:** Enhance childcare and adult services identified in community assessment survey.

### **Strategies:**

- Extend service hours to accommodate working families.
- Provide workshops to equip families with financial and budgeting tools for home ownership opportunities.

### **Outcomes:**

- Increase number of children receiving after hours and weekend childcare services. (Family)

## Goal 5: Scale Operations for Future Growth

### National Goals:

- #3 – *People with low incomes are engaged and active in building opportunities in communities.*

### Strategic Priorities:

- #4 – *Increase Brand Awareness*

**Objective 5.1:** Invest in training staff on technology usage.

### Strategies:

- Develop training plan for new hires on security policies, computer setup, and navigating within various software and platforms being utilized.
- Facilitate semi-annually trainings for staff on proper email, computer and internet usage.

### Outcomes:

- Staff knowledge on the usage of technology is improved and effectiveness increased. (Agency)

**Objective 5.2:** Create action plans for staff's professional development.

### Strategies:

- Identify staff's professional development needs.
- Create training programs or identify training courses to address staff's professional development needs.
- Evaluate and assess through annual reviews.

### Outcomes:

- Increase staff resources and trainings to perform their job. (Agency)
- Staff receive certifications that allow professional growth. (Agency)

**Objective 5.3:** Streamline processes and procedures.

### Strategies:

- Train staff on shared drive usage and revamp security access of file folders.
- Create an intranet site to connect staff to work-relevant information including other staff members, company culture, values, policies and procedures, and department information.

**Outcomes:**

- Reduce paper consumption of staff. (Agency)
- Create an intranet as a communication bridge between the agency and staff. (Agency)

When understanding the impacts of programs or initiatives, progress and success must be evaluated and monitored. To track performance and accountability, The ALPI can utilize an agency-wide scorecard located in **Appendix D**. By utilizing the scorecard, the focus will be on outcomes related to the strategic plan and agency initiatives.

## Implementation and Accountability

The 2020-2024 Strategic Plan is a “living document” that was developed to help guide and assist The ALPI to fulfill its mission and overall vision. This document provides The ALPI a five-year roadmap that supports the services and strategies of the organization.

This strategic plan was designed to provide The ALPI with a series of ambition initiatives to start the organization on a trajectory that will catapult the Agency to the forefront of meeting the needs of low-income families. Emphases were given to the goals as outlined in the National Community Action Network (TOC).

It is understood that The ALPI may face a lack of resources to proceed with the total package of initiatives found within this plan. However, any short comings should not diminish the Agency’s efforts to proceed with the prioritized initiatives that can be funded and deemed feasible at this time. Furthermore, the implementation of each strategy is at the discretion of the Chief Executive Officer and Board. Therefore, the contents in this plan does not bind nor commit the Agency to proceed with any initiative without their approval.

Essentially, the Strategic Plan is a roadmap rather than a final product. The plan will provide for continuous improvement of efficiency and effectiveness of The ALPI’s operations to deliver high quality services, advocacy, and commitment of resources to their service area. Leadership will use this information to guide the organization toward the fulfillment of its mission. Changing economic, political, and cultural climate will require the review and re-evaluation of the plan on an annual basis.

Once approved by the Board, the strategic plan will be implemented by Management and Staff with oversight from The ALPI’s Chief Executive Officer. Managers and staff will align annual programs and budgets with the agency-wide strategic plan. The Chief Executive Officer and Management Staff will review progress quarterly and update the plan annually as deemed appropriately.

## APPENDIX

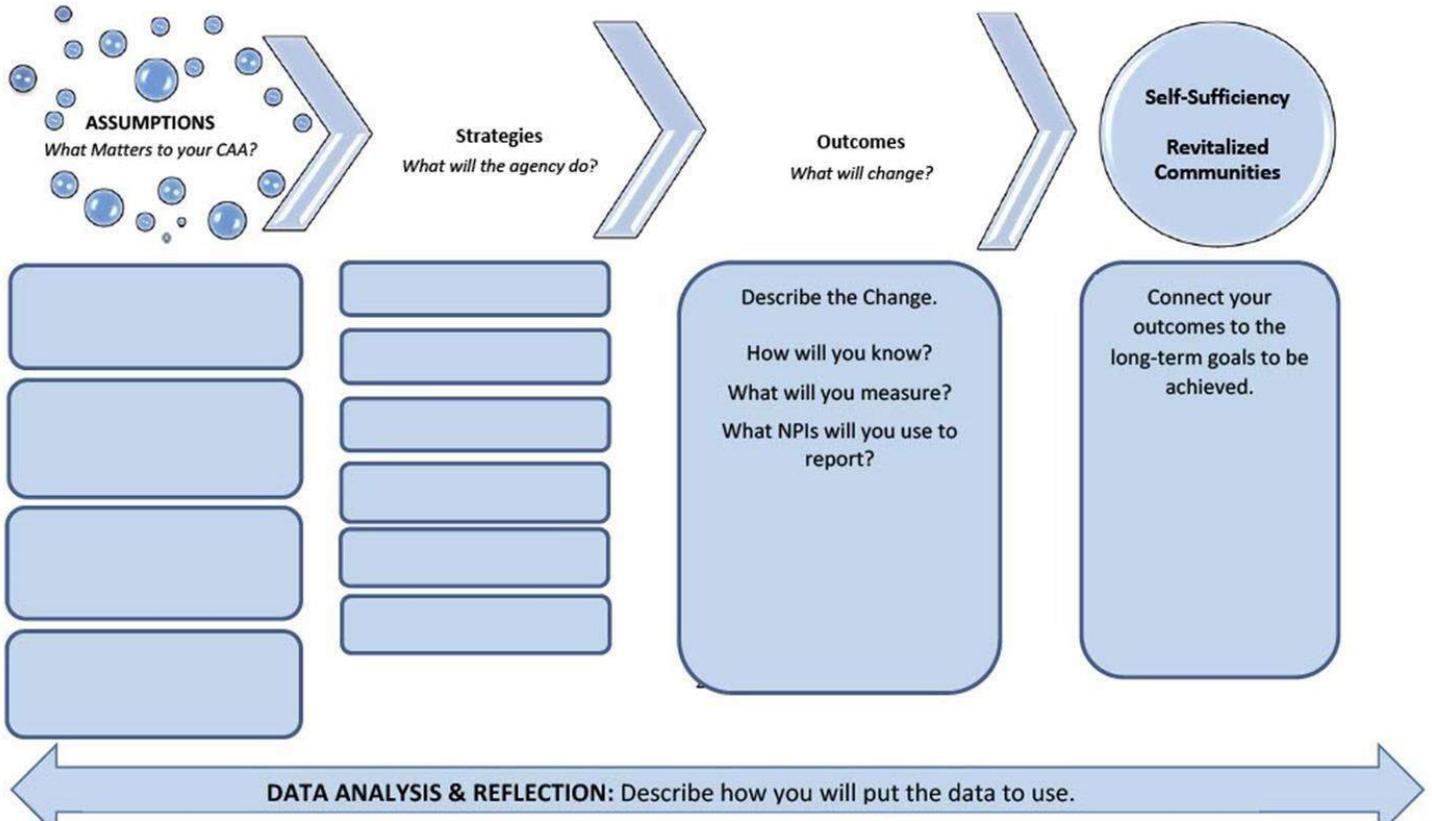
## Appendix A

# The National Community Action Network Theory of Change Community Action Goals



# Appendix B

## Local Community Action Theory of Change



## Appendix C

### The ALPI Theory of Change

#### The Agricultural and Labor Program, Inc Theory of Change

#### AGENCY GOALS

Broaden Partnerships with Human Service Entities

Increase Service and Funding Capacity

Enhance Brand Identity and Marketing

Connect Community Resources to Enhance Family Services

Scale Operations for Future Growth

#### OUTCOMES

##### FAMILY

- Improve children & family nutrition
- Increased awareness of ALPI's brand by low-income families

- Increase number of children receiving extended childcare services

##### AGENCY

- On-site health insurance agency
- Low-income credit union
- ALPI foundation
- ALPI thrift store
- Increased community and brand awareness
- Staff obtain STEM certification

- Technology usage improved by staff
- Increase staff resources and trainings
- Staff receive certification for professional growth
- Reduce paper consumption of staff
- Create an intranet as communication bridge

##### COMMUNITY

- Certification & employment opportunities
- Establish charter school
- Transportation for medical assistance
- Staff adequately communicates program and services
- Engaged children and adults towards STEM opportunities

**VISION:** To be the premier poverty fighting Community Action Agency in America.

**MISSION:** To collaborate with community partners and deliver human service programs that empower the economically disadvantaged and others to be self-sufficient.

## Appendix D

### The ALPI Agency-Wide Scorecard

<b>Goal:</b>				
<b>Objective:</b>				
<b>Strategy:</b>				
<b>Date Assigned:</b>	<b>Days in a Working Status:</b>	<b>Date Completed:</b>		
<b>Outcomes</b>	<b>Unit Responsible</b>	<b>Target</b>	<b>Achieved</b>	<b>Status Update</b>

- Completed
- Working
- Date Assigned

Internal Revenue Service

Date: October 5, 2006

THE AGRICULTURAL AND LABOR  
PROGRAM INCORPORATED  
PO BOX 3126  
WINTER HAVEN FL 33885-3126 263

Department of the Treasury  
P. O. Box 2508  
Cincinnati, OH 45201

Person to Contact:  
Richard E. Owens 31-07974  
Customer Service Representative  
Toll Free Telephone Number:  
877-829-5500  
Federal Identification Number:  
59-1634148

Dear Sir or Madam:

This is in response to your request of October 5, 2006, regarding your organization's tax-exempt status.

In January 1980 we issued a determination letter that recognized your organization as exempt from federal income tax. Our records indicate that your organization is currently exempt under section 501(c)(3) of the Internal Revenue Code.

Our records indicate that your organization is also classified as a public charity under sections 509(a)(1) and 170(b)(1)(A)(vi) of the Internal Revenue Code.

Our records indicate that contributions to your organization are deductible under section 170 of the Code, and that you are qualified to receive tax deductible bequests, devises, transferor gifts under section 2055, 2106 or 2522 of the Internal Revenue Code.

If you have any questions, please call us at the telephone number shown in the heading of this letter.

Sincerely,

Janna K. Skufca, Director, TE/GE  
Customer Account Services



FLORIDA

## Consumer's Certificate of Exemption

Issued Pursuant to Chapter 212, Florida Statutes

DR-14  
R. 01/18

85-8012667623C-6	10/31/2021	10/31/2026	501(C)(3) ORGANIZATION
Certificate Number	Effective Date	Expiration Date	Exemption Category

This certifies that

THE AGRICULTURAL AND LABOR PROGRAM INC  
300 LYNCHBURG RD  
LAKE ALFRED FL 33850-2576

is exempt from the payment of Florida sales and use tax on real property rented, transient rental property rented, tangible personal property purchased or rented, or services purchased.



FLORIDA

## Important Information for Exempt Organizations

DR-14  
R. 01/18

1. You must provide all vendors and suppliers with an exemption certificate before making tax-exempt purchases. See Rule 12A-1.038, Florida Administrative Code (F.A.C.).
2. Your *Consumer's Certificate of Exemption* is to be used solely by your organization for your organization's customary nonprofit activities.
3. Purchases made by an individual on behalf of the organization are taxable, even if the individual will be reimbursed by the organization.
4. This exemption applies only to purchases your organization makes. The sale or lease to others of tangible personal property, sleeping accommodations, or other real property is taxable. Your organization must register, and collect and remit sales and use tax on such taxable transactions. Note: Churches are exempt from this requirement except when they are the lessor of real property (Rule 12A-1.070, F.A.C.).
5. It is a criminal offense to fraudulently present this certificate to evade the payment of sales tax. Under no circumstances should this certificate be used for the personal benefit of any individual. Violators will be liable for payment of the sales tax plus a penalty of 200% of the tax, and may be subject to conviction of a third-degree felony. Any violation will require the revocation of this certificate.
6. If you have questions about your exemption certificate, please call Taxpayer Services at 850-488-6800. The mailing address is PO Box 6480, Tallahassee, FL 32314-6480.

# *State of Florida*

## *Department of State*

I certify from the records of this office that THE AGRICULTURAL AND LABOR PROGRAM, INCORPORATED is a corporation organized under the laws of the State of Florida, filed on May 3, 1976.

The document number of this corporation is 735710.

I further certify that said corporation has paid all fees due this office through December 31, 2022, that its most recent annual report/uniform business report was filed on January 8, 2022, and that its status is active.

I further certify that said corporation has not filed Articles of Dissolution.

*Given under my hand and the  
Great Seal of the State of Florida  
at Tallahassee, the Capital, this  
the Eighth day of January, 2022*



*Ronald R. DeSantis*  
Secretary of State

Tracking Number: 2697051116CC

To authenticate this certificate, visit the following site, enter this number, and then follow the instructions displayed.

<https://services.sunbiz.org/Filings/CertificateOfStatus/CertificateAuthentication>



**FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES**  
**COMMISSIONER NICOLE "NIKKI" FRIED**

---

April 12, 2021

Refer To: CH2137

AGRICULTURAL AND LABOR PROGRAM, INC.  
PO BOX 3126  
WINTER HAVEN, FL 33885-3126

RE: AGRICULTURAL AND LABOR PROGRAM, INC.  
REGISTRATION#: CH2137  
EXPIRATION DATE: April 13, 2022

Dear Sir or Madam:

The above-named organization/sponsor has complied with the registration requirements of Chapter 496, Florida Statutes, the Solicitation of Contributions Act. **A COPY OF THIS LETTER SHOULD BE RETAINED FOR YOUR RECORDS.**

Every charitable organization or sponsor which is required to register under s. 496.405 must conspicuously display the registration number issued by the Department and in capital letters the following statement on every printed solicitation, written confirmation, receipt, or reminder of a contribution:

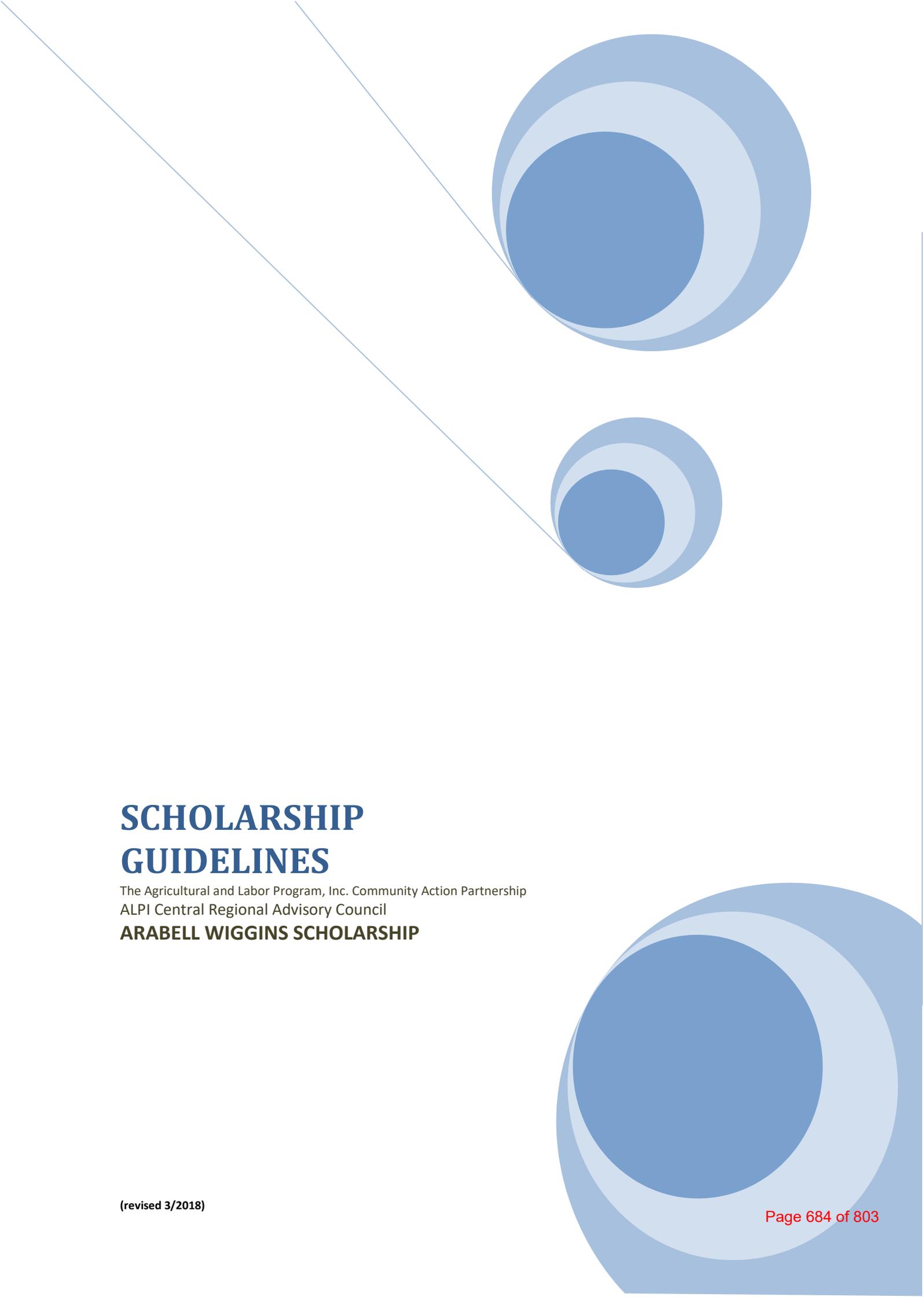
"A COPY OF THE OFFICIAL REGISTRATION AND FINANCIAL INFORMATION MAY BE OBTAINED FROM THE DIVISION OF CONSUMER SERVICES BY CALLING TOLL-FREE (800-435-7352) WITHIN THE STATE. REGISTRATION DOES NOT IMPLY ENDORSEMENT, APPROVAL, OR RECOMMENDATION BY THE STATE."

The Solicitation of Contributions Act requires an annual renewal statement to be filed on or before the date of expiration of the previous registration. The Department will send a renewal package approximately 30 days prior to the date of expiration as shown above.

Thank you for your cooperation. If we may be of further assistance, please contact the Solicitation of Contributions section.

Sincerely,

Kayla Creech  
Regulatory Consultant  
850-410-3769  
Fax: 850-410-3804  
E-mail: [kayla.creech@fdacs.gov](mailto:kayla.creech@fdacs.gov)



# SCHOLARSHIP GUIDELINES

The Agricultural and Labor Program, Inc. Community Action Partnership  
ALPI Central Regional Advisory Council

## **ARABELL WIGGINS SCHOLARSHIP**

# Scholarship Program Overview

---

## 1. Purpose

The Agricultural and Labor Program, Inc. (ALPI) believes that it is a critical time for the organization to expand efforts to make higher education a reality for qualified high school graduates. It is also the belief of the ALPI organization that by seizing this opportunity, we as an organization via our Regional Advisory Councils, can provide a viable gateway to sustainable, long-term economic benefits to these graduates and the ALPI Central Region communities.

The ALPI further believes that because our world has become more technical as well as more competitive, a high school education is not sufficient to get a good job. The ALPI Central Region communities like all communities throughout the nation, needs a growing educated and skilled workforce to compete in today's global marketplace. Therefore, the creation of the ***Arabell Wiggins Scholarship*** will provide an opportunity for an eligible Central Region graduate to continue their education to improve their chances of getting a good job and ultimately secure and maintain self-sufficiency.

## 2. Scholarship Award

A scholarship award in the amount of \$500.00 and a certificate will be awarded for 1 year to an eligible graduate(s) selected by the Central Regional Advisory Council's Scholarship Committee.

## 3. Eligibility Criteria

- Applicant must be a resident of the Central Region (Winter Haven, Bartow, Auburndale, Polk City, Lake Alfred, Haines City, Davenport, Mulberry, or Lakeland, etc).
- Applicant must be a graduating high school senior in the year the award is presented.
- Applicant must have been accepted into community college or university for the current award year.
- Applicant's family may or may not have received services from one of The Agricultural and Labor Program, Inc. affiliated programs.

## 4. Application Process

Applicant must submit the following items:

- Completed application form (if handwritten, must be legible).
- Letter of application addressed to the Scholarship Committee. The letter should contain a brief explanation of career goals and biographical (background) information.
- Acceptance letter or proof of college enrollment for current year.
- Statement of financial need that ties into and describes the services that may or may not have been received from The Agricultural and Labor Program, Inc. affiliated programs.
- Three (3) signed letters of recommendations from significant persons in your school, church or community.
- An official and most recent high school transcript with cumulative grade point average and a class standing/rank.
- Personal Essay including personal educational goals and career objectives (not to exceed 300 words).

## 5. Deadline Date

The 2022 deadline date to submit the application is July 1, 2022. Applications postmark after this date will not be considered. Please mail or deliver application in person to:

**The Agricultural and Labor Program, Inc.**  
Central Regiona Advisory Council  
**Arabell Wiggins Scholarship Committee**  
Attention: Al Miller  
300 Lynchburg Road  
Lake Alfred, FL 33850

## 6. Method of Payment

Scholarship funds will be awarded to the selected applicant upon evidence of registration and acceptance in an accredited post secondary institution. Payment in the form of a check will be payable to the applicant.

## 7. Criteria for Selection

Each neatly printed or typed application must be accompanied by:

- Letter of application addressed to the Scholarship Committee.
- Three (3) signed letters of recommendations from significant persons in your school, church or community.

- An official and most recent high school transcript with cumulative grade point average and a class standing/rank.
- Personal Essay including personal educational goals and career objectives (not to exceed 300 words).
- Proof of enrollment or proof of acceptance in an accredited institution of higher learning.
- Statement of financial need that ties into and describes the services that may or may not have been received from The Agricultural and Labor Program, Inc. affiliated programs.

**Note:** Failure to meet any of the above will result in automatic elimination.

## 8. Rating Criteria

Criteria	Maximum Points
1. Completeness of Information	20 points
2. Letters of reference or recommendations	15 points
3. G.P.A. or test Scores	20 points
4. Financial need	25 points
5. Personal Goal Statement	10 points
6. Community Service	10 points
<b>Total Points</b>	<b>100 points</b>

## 9. Notification of Scholarship Award

The applicant selected will be notified by mail within 60 days from the application deadline date.

**Arlene V. Dobison, CCAP, NCRI**  
Chief Executive Officer

**Corporate Office**  
300 Lynchburg Road  
Lake Alfred, Florida 33850-2576  
(863) 956-3491  
Toll Free: 1 (800) 330-3491  
Fax: (863) 956-3357  
E-Mail: admin@alpi.org  
www.alpi.org

**ADMINISTRATION & OPERATIONS DIVISION**

**ADMINISTRATION SERVICES**

Executive Office  
Budget & Finance  
Human Resources  
IT/Computer Support & Marketing

**COMMUNITY SERVICES & ECONOMIC DEVELOPMENT DIVISION**

**CSBG Services**

**Service Areas:** Glades, Hendry, Highlands and Polk Counties

**Farmworker Emergency Services**

**Service Areas:** Statewide

**LIHEAP Services**

**Service Areas:** Collier, Glades, Hendry, Highlands, Martin, Polk and St. Lucie Counties

**Housing Counseling Services**

**Service Area:** Polk County

**Training and Employment Services**

**Service Areas:** Glades, Hendry, Highlands, Polk, St. Lucie and Volusia Counties

**ALPI Technical Education Center**

**Service Area:** Volusia County

**EHEAP Services**

**Service Area:** Polk County

**CHILD DEVELOPMENT & FAMILY SERVICES DIVISION**

**Head Start Services**

**Service Area:** St. Lucie and Martin Counties

**Early Head Start Services**

**Service Areas:** Polk, St. Lucie and Martin Counties

**Child Care**

**Service Areas:** Polk (Frostproof) and St. Lucie Counties

**Child Care Food**

**Service Areas:** Polk (Frostproof) and St. Lucie Counties

**Voluntary Pre-Kindergarten (VPK) Services**

**Service Areas:** Polk and St. Lucie Counties

**School Readiness Services**

**Service Areas:** Polk and St. Lucie Counties

**Computer Assisted Tutorial Program (CAT)**

**Service Area:** St. Lucie County

**Eastern Region Administration Office**

2202 Avenue Q  
Ft. Pierce, FL 34950  
(772) 466-2631  
Toll Free: 1 (800) 791-3099  
Fax: (772) 464-3035



**MEMORANDUM**

TO: All ALPI Full-time Employees  
FROM: Arlene Dobison, CEO *AD*  
DATE: November 16, 2021  
SUBJECT: ALPI 2022 Annual Corporate Meeting and Annual Employee Training Conference

This year we will be celebrating 54 years of “Providing A Constant Flow of Community Services” to our children, families and farmworkers. This event will be celebrated in person on Saturday, January 22, 2022. For your consideration, I would like to request a one-time voluntary contribution of \$35.00 towards this event. Your contribution can be made via a lump sum payment of \$35.00 or a minimum payroll deduction as low as \$8.75 per pay period (see attached commitment form).

The Annual Employee Training Conference will be held on Friday and Saturday, January 21 & 22, 2022, in person. For all regular full-time employees, your attendance will be required on Friday and Saturday. Overnight stay will only be required for employees traveling from Polk County.

I am requesting the attached Commitment Form be completed and returned by ALL regular full-time employees, no later than Wednesday, November 24, 2021.

As always, thank you in advance for your continued voluntary support of the ALPI Organization. Should you have any questions and/or concerns, please feel free to direct them to my attention.

Attachment

PROGRAMS AND SERVICES ARE FUNDED IN PART BY:



United Way of Central Florida and United Way of St. Lucie County

THE AGRICULTURAL AND LABOR PROGRAM, INC. — PROVIDING A CONSTANT FLOW OF COMMUNITY SERVICES SINCE 1968  
AN EQUAL OPPORTUNITY EMPLOYER



**ACKNOWLEDGMENT/COMMITMENT FORM**

Annual Meeting & Staff Training Conference  
January 21-22, 2022

\_\_\_\_\_ I acknowledge receipt of the 2022 Annual Meeting & Staff Training Conference Memo

**AND**

**PLEASE CHECK (✓) ONE OF THE FOLLOWING RESPONSES:**

I would like to make the following voluntary commitment:

\_\_\_\_\_ One-time payment of \$35.00 (see attached check or money order)

\_\_\_\_\_ One-time payment of \$35.00 via payroll deduction, effective

\_\_\_\_\_ Bi-weekly payments (i.e., \$8.75) via payroll deduction, effective \_\_\_\_\_

\_\_\_\_\_ Other – Please address comments/concerns to the attention of Arlene Dobison, CEO

**FINAL COMMITMENT/PAYMENT IS TO BE RECEIVED BY January 21, 2022**

Printed Name \_\_\_\_\_

Date \_\_\_\_\_

Note: It is your responsibility to ensure that this completed **FORM (with or without commitment)** is returned by the deadline date of **Wednesday, November 24, 2021**. Faxes will be accepted via Marnita Johnson at (863) 956-3357.

# **The Agricultural and Labor Program, Incorporated**

Financial and Compliance Report  
June 30, 2021

## Contents

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RSM US LLP

## Independent Auditor's Report

Board of Directors  
The Agricultural and Labor Program, Incorporated

### Report on the Financial Statements

We have audited the accompanying financial statements of The Agricultural and Labor Program, Incorporated, which comprise the statements of financial position as of June 30, 2021 and 2020, and the related statements of activities, functional expenses and cash flows for the years then ended, and the related notes to the financial statements.

### Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

### Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

### Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of The Agricultural and Labor Program, Incorporated as of June 30, 2021 and 2020, and the changes in its net assets and its cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

**Other Matters – Supplementary Information**

Our audit was conducted for the purpose of forming an opinion on the financial statements as a whole. The accompanying schedule of expenditures of federal awards, as required by Title 2 U.S. Code of Federal Regulations Part 200, *Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards* (Uniform Guidance), is presented for purposes of additional analysis and is not a required part of the financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the information is fairly stated, in all material respects, in relation to the financial statements as a whole.

**Other Reporting Required by *Government Auditing Standards***

In accordance with *Government Auditing Standards*, we have also issued our report dated January 11, 2022, on our consideration of The Agricultural and Labor Program, Incorporated's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements and other matters. The purpose of that report is solely to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of The Agricultural and Labor Program, Incorporated's internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering The Agricultural and Labor Program, Incorporated's internal control over financial reporting and compliance.

*RSM US LLP*

Orlando, Florida  
January 11, 2022

The Agricultural and Labor Program, Incorporated

Statements of Financial Position  
June 30, 2021 and 2020

	2021	2020
<b>Assets</b>		
Current assets:		
Cash	\$ 997,819	\$ 2,082,373
Accounts receivable	1,978,572	1,963,304
Prepaid expenses	95,293	417,260
<b>Total current assets</b>	<b>3,071,684</b>	<b>4,462,937</b>
Property and equipment, net	1,258,529	1,185,755
Refundable deposits	10,448	10,448
<b>Total assets</b>	<b>\$ 4,340,661</b>	<b>\$ 5,659,140</b>
<b>Liabilities and Net Assets</b>		
Current liabilities:		
Accounts payable	\$ 822,533	\$ 1,703,903
Accrued expenses	768,171	577,424
Current portion of note payable	16,913	32,569
Refundable advances	12,900	982,752
<b>Total current liabilities</b>	<b>1,620,517</b>	<b>3,296,648</b>
Note payable, net of current portion	-	16,913
<b>Total liabilities</b>	<b>1,620,517</b>	<b>3,313,561</b>
Commitments and contingencies (Notes 7 and 10)		
Net assets without donor restrictions	2,720,144	2,345,579
<b>Total liabilities and net assets</b>	<b>\$ 4,340,661</b>	<b>\$ 5,659,140</b>

See notes to financial statements.

The Agricultural and Labor Program, Incorporated

Statements of Activities  
Years Ended June 30, 2021 and 2020

	2021	2020
Support and revenue:		
U.S. Department of Health and Human Services	\$ 9,630,946	\$ 8,043,511
Early Learning Coalitions:		
Voluntary Prekindergarten Education Program (VPK)	440,016	909,691
Childcare	201,177	178,532
State of Florida, Departments of:		
Economic Opportunity	9,490,501	4,890,492
Education and Health	556,195	622,758
In-kind contributions	711,143	837,602
Other support and revenue	1,046,627	526,919
<b>Total support and revenue</b>	<b>22,076,605</b>	<b>16,009,505</b>
Expenses:		
Program services:		
Head Start	9,479,297	8,069,364
Energy	8,150,899	3,789,913
Social services	2,033,231	1,400,324
Child development	406,170	1,005,426
Food	488,795	525,265
<b>Total program services</b>	<b>20,558,392</b>	<b>14,790,292</b>
Supporting services:		
Management and general	1,143,648	1,091,857
<b>Total expenses</b>	<b>21,702,040</b>	<b>15,882,149</b>
<b>Change in net assets</b>	<b>374,565</b>	<b>127,356</b>
Net assets:		
Beginning	2,345,579	2,218,223
Ending	<b>\$ 2,720,144</b>	<b>\$ 2,345,579</b>

See notes to financial statements.

The Agricultural and Labor Program, Incorporated

Statement of Functional Expenses  
Year Ended June 30, 2021

	Program Services						Supporting Services	
	Head Start	Energy	Social Services	Child Development	Food	Total Program Services	Management and	Total Expenses
Salaries	\$ 4,777,026	\$ 727,350	\$ 508,891	\$ 298,638	\$ 74,901	\$ 6,386,806	\$ 648,984	\$ 7,035,790
Fringe benefits	1,172,983	179,049	124,917	69,845	18,430	1,565,224	160,181	1,725,405
<b>Total salaries and related expenses</b>	<b>5,950,009</b>	<b>906,399</b>	<b>633,808</b>	<b>368,483</b>	<b>93,331</b>	<b>7,952,030</b>	<b>809,165</b>	<b>8,761,195</b>
Grants, subsidies and contributions	1,438	6,671,675	1,060,563	-	-	7,733,676	41,798	7,775,474
In-kind expenses	711,143	-	-	-	-	711,143	-	711,143
Contractual services	181,923	23,069	13,977	3,212	-	222,181	53,633	275,814
Rent and utilities	400,913	52,060	26,988	3,412	7,121	490,494	67,317	557,811
Subcontractors	791,292	166,470	45,723	-	-	1,003,485	-	1,003,485
Materials and supplies	735,400	26,215	11,888	-	-	773,503	73,584	847,087
Other	68,062	3,965	22,032	9,232	5,163	108,454	57,882	166,336
Food	7,871	-	-	797	371,892	380,560	-	380,560
Communications	362,494	281,704	194,561	568	-	839,327	32,344	871,671
Depreciation	259,828	10,666	15,353	20,421	8,667	314,935	4,684	319,619
Travel	8,924	8,676	8,338	45	2,621	28,604	3,241	31,845
<b>Total expenses</b>	<b>\$ 9,479,297</b>	<b>\$ 8,150,899</b>	<b>\$ 2,033,231</b>	<b>\$ 406,170</b>	<b>\$ 488,795</b>	<b>\$ 20,558,392</b>	<b>\$ 1,143,648</b>	<b>\$ 21,702,040</b>

See notes to financial statements.

The Agricultural and Labor Program, Incorporated

Statement of Functional Expenses  
Year Ended June 30, 2020

	Head Start	Program Services					Supporting Services		Total Expenses
		Energy	Social Services	Child Development	Food	Total Program Services	Management and General	Total	
Salaries	\$ 4,243,938	\$ 512,794	\$ 420,202	\$ 551,842	\$ 161,073	\$ 5,889,849	\$ 638,938	\$ 6,528,787	
Fringe benefits	1,116,509	138,264	110,135	139,873	43,105	1,547,886	173,103	1,720,989	
<b>Total salaries and related expenses</b>	<b>5,360,447</b>	<b>651,058</b>	<b>530,337</b>	<b>691,715</b>	<b>204,178</b>	<b>7,437,735</b>	<b>812,041</b>	<b>8,249,776</b>	
Grants, subsidies and contributions	948	2,687,052	553,768	-	-	3,241,768	29,634	3,271,402	
In-kind expenses	837,602	-	-	-	-	837,602	-	837,602	
Contractual services	156,220	35,766	17,765	24,941	-	234,692	65,477	300,169	
Rent and utilities	299,390	46,285	23,275	35,000	8,139	412,089	33,920	446,009	
Subcontractors	222,697	57,810	43,877	-	-	324,384	-	324,384	
Materials and supplies	391,600	54,660	26,071	179,258	97	651,696	27,355	679,051	
Other	152,083	6,441	60,936	21,686	463	241,609	91,834	333,443	
Food	137,041	-	-	16,420	298,634	452,095	-	452,095	
Communications	265,791	219,931	105,155	28,908	800	620,585	8,765	629,350	
Depreciation	119,524	9,634	15,302	6,344	8,925	159,729	3,835	163,564	
Travel	126,021	21,276	23,838	1,144	4,029	176,308	18,996	195,304	
<b>Total expenses</b>	<b>\$ 8,069,364</b>	<b>\$ 3,789,913</b>	<b>\$ 1,400,324</b>	<b>\$ 1,005,426</b>	<b>\$ 525,265</b>	<b>\$ 14,790,292</b>	<b>\$ 1,091,857</b>	<b>\$ 15,882,149</b>	

See notes to financial statements.

The Agricultural and Labor Program, Incorporated

Statements of Cash Flows  
Years Ended June 30, 2021 and 2020

	2021	2020
Cash flows from operating activities:		
Change in net assets	\$ 374,565	\$ 127,356
Adjustments to reconcile change in net assets to net cash (used in) provided by operating activities:		
Depreciation	319,619	163,564
Loss on disposal of property and equipment	-	2,576
Changes in operating assets and liabilities:		
(Increase) decrease in assets:		
Accounts receivable	(15,268)	(249,255)
Prepaid expenses	321,967	(357,349)
Increase (decrease) in liabilities:		
Accounts payable	(881,370)	934,254
Accrued expenses	190,747	96,764
Refundable advances	(969,852)	957,550
<b>Net cash (used in) provided by operating activities</b>	<b>(659,592)</b>	<b>1,675,460</b>
Cash flows from investing activities:		
Purchases of property and equipment	(392,393)	(360,966)
<b>Net cash used in investing activities</b>	<b>(392,393)</b>	<b>(360,966)</b>
Cash flows from financing activities:		
Payments on note payable	(32,569)	(30,962)
<b>Net cash used in financing activities</b>	<b>(32,569)</b>	<b>(30,962)</b>
<b>Net (decrease) increase in cash</b>	<b>(1,084,554)</b>	<b>1,283,532</b>
Cash:		
Beginning	2,082,373	798,841
Ending	\$ 997,819	\$ 2,082,373
Supplemental disclosure of cash flow information:		
Cash paid during the year for interest	\$ 1,759	\$ 3,366

See notes to financial statements.

## The Agricultural and Labor Program, Incorporated

### Notes to Financial Statements

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#### Note 1. Nature of Organization and Significant Accounting Policies

**Nature of organization:** The Agricultural and Labor Program, Incorporated (ALPI) is a nonprofit corporation organized to provide assistance and services to migrant and seasonal farm-workers, the rural poor and disenfranchised persons located in 27 counties, principally in southern and central Florida. Incorporated in 1976, ALPI represents the combination of four previously existing Community Development Boards, which were part of the Agricultural Labor Project of Coca-Cola Foods (Minute Maid).

A summary of ALPI's significant accounting policies follows:

**Basis of accounting:** The accompanying financial statements have been prepared on the accrual basis of accounting.

**Basis of presentation:** A nonprofit organization is required to report information regarding its financial position and activities according to two classes of net assets: without donor restrictions and with donor restrictions. Accordingly, net assets of ALPI and changes therein are classified and reported as follows:

**Net assets without donor restrictions:** Net assets that are not subject to donor-imposed stipulations but may be designated for specific purposes by action of the Board of Directors.

**Net assets with donor restrictions:** Net assets subject to donor-imposed stipulations that may or will be met either by actions of ALPI, passage of time or permanently maintained by ALPI. When a restriction expires, net assets with donor restrictions are reclassified to net assets without donor restrictions and reported in the statements of activities as net assets released from restrictions. ALPI has no net assets with donor restrictions.

**Accounts receivable:** Accounts receivable are stated at net realizable value. ALPI uses the allowance method to determine uncollectible accounts receivable. The allowance is established based upon management's analysis of specific accounts and other economic factors. In the opinion of management, no allowance for uncollectible accounts receivable was considered necessary at June 30, 2021 and 2020.

**Property and equipment:** Property and equipment are capitalized at cost when purchased, or at fair value at the date of gift, if contributed. Depreciation of property and equipment is provided for using the straight-line method of accounting over the estimated useful lives of the assets. Property and equipment purchased with grant awards are considered to be owned by the ALPI while used in the program or future authorized programs. However, certain awarding agencies, primarily federal agencies, retain a reversionary interest in the property and equipment for specified time periods, requiring the return of the assets or proceeds of sale of the assets in proportion to the percentage of grant funds used upon termination of the grant contract. The cost of assets retired or sold, together with the related accumulated depreciation, is removed from the accounts and any gains or losses from disposition are credited or charged to income. Expenditures for major renewals and betterments that extend the useful lives of property and equipment are capitalized. Expenditures for maintenance and repairs are charged to expense as incurred. Amortization of leasehold improvements is provided on the straight-line method of accounting over the remaining term of the lease or the useful life of the improvement, whichever is shorter.

## The Agricultural and Labor Program, Incorporated

### Notes to Financial Statements

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#### Note 1. Nature of Organization and Significant Accounting Policies (Continued)

**Impairment of long-lived assets:** The carrying value of property and equipment is reviewed for impairment whenever events or changes in circumstances indicate such value may not be recoverable. Recoverability of assets or asset groups to be held and used is measured by a comparison of the carrying amount of an asset or asset group to future net cash flows expected to be generated by the asset or asset group. If such assets or asset groups are considered to be impaired, the impairment to be recognized is measured by the amount by which the carrying amount of the assets or asset groups exceeds the fair value of the assets or asset groups. Assets or asset groups to be disposed of are reported at the lower of the carrying amount or fair value less cost to sell. No impairment of its long-lived assets or asset groups has been recognized during the years ended June 30, 2021 and 2020.

**Support and revenue:** ALPI is principally funded by grants and contracts from federal, state and local governmental agencies. Grants and contracts are considered exchange transactions if each party receives and sacrifices commensurate value. Funds from these exchange transactions are not considered contributions and are deemed to be earned and reported as revenue when such funds have been expended towards the designated purpose. Receivables are recorded to the extent costs have been incurred but not yet reimbursed by these agencies. Conversely, funds received in advance and not yet earned are recorded as refundable advances.

Grants and contracts not considered exchange transactions are recognized as revenue when the funds are utilized by ALPI to carry out the activity stipulated by the grant or contract. The grants and contracts can be terminated by the grantor or refunding can be required under certain circumstances coupled with other performance and/or control barriers. For these reasons, these grant and contract agreements are considered conditional. Receivables are recorded to the extent costs have been incurred but not yet reimbursed by these agencies. Conversely, funds received in advance and not yet earned are recorded as refundable advances.

**Contributions:** Contributions received are recorded at fair value as net assets without donor restrictions or net assets with donor restrictions support depending on the existence or nature of any donor restrictions. Contributions that are restricted by the donor are reported as increases in net assets without donor restrictions if the restrictions are met in the year in which the contributions are recognized. Contributed services are recognized if the services received create or enhance non-financial assets or require specialized skills, are provided by individuals possessing those skills, and would typically need to be purchased if not provided by contribution.

The estimated fair value of contributed materials, facilities and services is reflected as support and expenses in the accompanying statements of activities and statements of functional expenses in the period in which the materials, facilities and services are utilized. Contributed materials, facilities and services amounted to \$711,143 and \$837,602 for the years ended June 30, 2021 and 2020, respectively.

**Income taxes:** ALPI is exempt from federal income taxes under Section 501(c)(3) of the Internal Revenue Code and from state income taxes under similar provisions of the Florida Statutes. Accordingly, no provision for federal and state income taxes has been recorded in the accompanying financial statements. In addition, management assessed whether there were any uncertain tax positions, which may give rise to income tax liabilities and determined that there were no such matters requiring recognition in the accompanying financial statements. ALPI files income tax returns in the U.S. federal jurisdiction. Generally, ALPI is no longer subject to U.S. federal income tax examinations by tax authorities for years before June 30, 2018.

## The Agricultural and Labor Program, Incorporated

### Notes to Financial Statements

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#### Note 1. Nature of Organization and Significant Accounting Policies (Continued)

**Functional allocation of expenses:** The cost of providing the various programs and other activities has been detailed in the statements of functional expenses and summarized on a functional basis in the statements of activities. Salaries and other expenses that are associated with a specific program are charged directly to that program. Salaries and other expenses that benefit more than one program are allocated to the various programs based on the relative benefit provided. Occupancy costs are allocated to the various programs based on square footage occupied by each program. ALPI does not actively engage in fundraising activities; therefore, no fundraising expenses are included in the accompanying financial statements.

**Use of estimates:** The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America (U.S. GAAP) requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and the disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of support and revenue, and expenses during the reporting period. Actual results could differ from those estimates.

**Concentrations of credit risk:** ALPI's financial instruments that are exposed to concentrations of credit risk consist of cash placed with federally insured financial institutions. Such accounts may at times exceed federally insured limits. ALPI has not experienced any losses on such accounts.

**Concentrations:** ALPI's primary funding sources are federal and state grants and awards.

**Newly adopted accounting pronouncement:** In May 2014, the Financial Accounting Standards Board (FASB) issued Accounting Standards Update (ASU) 2014-09, *Revenue from Contracts with Customers (Topic 606)*, requiring an entity to recognize the amount of revenue to which it expects to be entitled for the transfer of promised goods or services to customers. The update will replace most existing revenue recognition guidance in U.S. GAAP when it becomes effective and permits the use of either a full retrospective or retrospective with cumulative-effect transition method. The updated standard will become effective for annual reporting periods beginning after December 15, 2019. ALPI has adopted ASU 2014-09 as of July 1, 2020, using the cumulative-effect transition method with no material impacts on its financial statements.

**Recent accounting pronouncements:** In February 2016, the FASB issued its new lease accounting guidance in ASU 2016-02, *Leases (Topic 842)*. Under the new guidance, lessees will be required to recognize the following for all leases (with the exception of short-term leases) at the commencement date: (a) a lease liability, which is a lessee's obligation to make lease payments arising from a lease, measured on a discounted basis, and (b) a right-of-use asset, which is an asset that represents the lessee's right to use, or control the use of, a specified asset for the lease term. Lessees will no longer be provided with a source of off-balance sheet financing. Lessees must apply a modified retrospective transition approach for leases existing at, or entered into after, the beginning of the earliest comparative period presented in the financial statements. Nonpublic entities should apply the amendments for fiscal years beginning after December 15, 2021. Management is currently evaluating the impact this ASU will have on the financial statements.

The FASB has issued certain new or modifications to, or interpretations of, existing accounting guidance in addition to the ASU's described above. Management has considered the new pronouncements and does not believe that any other new or modified guidance will have a material impact on ALPI's reported financial position or activities in the near-term.

**Subsequent events:** Management has assessed subsequent events through January 11, 2022, the date the financial statements were available to be issued.

**The Agricultural and Labor Program, Incorporated**

**Notes to Financial Statements**

**Note 2. Accounts Receivable**

Accounts receivable at June 30, 2021 and 2020, consists of the following:

	2021	2020
U.S. Department of Health and Human Services	\$ 993,756	\$ 1,256,034
State of Florida, Department of:		
Economic Opportunity	678,002	598,276
Health	68,590	-
Education	57,967	14,127
Senior Connection Center, Inc.	58,994	8,972
Other	50,419	52,016
Early Learning Coalition of St. Lucie County	36,104	12,722
Florida Non-Profit Housing, Inc.	15,853	3,622
Children's Services Council of St. Lucie County	14,775	12,423
Heartland Coalition for the Homeless, Inc.	4,112	5,112
	<u>\$ 1,978,572</u>	<u>\$ 1,963,304</u>

**Note 3. Property and Equipment**

Property and equipment at June 30, 2021 and 2020, consists of the following:

	2021	2020
Land	\$ 545,000	\$ 545,000
Buildings and improvements	2,460,971	2,453,390
Machinery and equipment	2,055,395	1,764,965
Leasehold improvements	234,549	234,549
Furniture and fixtures	253,622	227,112
	<u>5,549,537</u>	<u>5,225,016</u>
Less accumulated depreciation	(4,291,008)	(4,039,261)
	<u>\$ 1,258,529</u>	<u>\$ 1,185,755</u>

Depreciation expense for the years ended June 30, 2021 and 2020, was \$319,619 and \$163,564, respectively.

**Note 4. Accrued Expenses**

Accrued expenses at June 30, 2021 and 2020, consists of the following:

	2021	2020
Salaries	\$ 437,508	\$ 244,063
Retirement benefits	233,408	220,787
Other	97,255	112,574
	<u>\$ 768,171</u>	<u>\$ 577,424</u>

## The Agricultural and Labor Program, Incorporated

### Notes to Financial Statements

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#### Note 5. Line of Credit

ALPI has a revolving line of credit with a bank totaling \$250,000, bearing interest at the prime rate plus .05% (3.30% at June 30, 2021), which is unsecured and matures on February 3, 2022. There was no balance outstanding under the line of credit at June 30, 2021 and 2020.

#### Note 6. Note Payable

In November 2018, ALPI entered into a note payable with a bank totaling \$95,637, as part of a financing agreement to purchase networking equipment. The note bears interest at a fixed interest rate of 5.07% and is payable in monthly principal and interest payments of \$2,861. The note is secured by the equipment financed under the note and matures in December 2021. The balance outstanding under the note payable at June 30, 2021 and 2020, was \$16,913 and \$49,482, respectively. The balance outstanding at June 30, 2021 of \$16,913 is due during the year ending June 30, 2022.

#### Note 7. Leases

ALPI leases various office space and equipment under noncancelable operating leases. Future minimum lease payments under noncancelable operating leases as of June 30, 2021, are as follows:

Years ending June 30:	
2022	\$ 229,202
2023	239,157
2024	269,629
	<u>\$ 737,988</u>

Rent expense for the years ended June 30, 2021 and 2020, amounted to \$318,469 and \$212,939, respectively.

#### Note 8. Other Support and Revenue

Other support and revenue for the years ended June 30, 2021 and 2020, consists of the following:

	2021	2020
United Way of Central Florida, Inc.	\$ 463,449	\$ 90,360
Senior Connection Center, Inc.	201,239	120,495
Other	185,016	95,433
Children's Services Council of St. Lucie County	55,642	88,268
Heartland Coalition for the Homeless, Inc.	47,722	51,010
Florida Non-Profit Housing, Inc.	34,725	29,700
Child care fees	21,858	30,588
E-Rate	21,594	-
U.S. Department of Housing and Urban Development	15,382	21,065
	<u>\$ 1,046,627</u>	<u>\$ 526,919</u>

## The Agricultural and Labor Program, Incorporated

### Notes to Financial Statements

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#### Note 9. Employee Benefit Plan

ALPI maintains a defined contribution retirement plan (the Plan) under Section 403(b) of the Internal Revenue Code. The Plan covers substantially all ALPI employees and will provide participating employees with additional retirement benefits from discretionary employer contributions. Contribution expense accrued by ALPI under the Plan was \$233,408 and \$220,787 for the years ended June 30, 2021 and 2020, respectively.

#### Note 10. Contingencies

ALPI receives significant financial assistance from federal, state and local governmental agencies in the form of grants. The disbursement of awards received under these programs generally requires compliance with terms and conditions specified in the grant agreements and is subject to audit by the awarding agencies. Disallowed claims, if any, resulting from such audits may become liabilities of ALPI. However, in the opinion of management, disallowed claims resulting from such audits, if any, will not have a material effect on ALPI's financial statements.

#### Note 11. Liquidity and Availability of Resources

As of June 30, 2021 and 2020, the following reflects ALPI's financial assets available for general use within one year of June 30, 2021 and 2020:

	2021	2020
Financial assets, at year-end:		
Cash	\$ 997,819	\$ 2,082,373
Accounts receivable	1,978,572	1,963,304
Financial assets available to meet cash needs for general expenditures within one year	<u>\$ 2,976,391</u>	<u>\$ 4,045,677</u>

ALPI has a policy of maintaining access to financial assets sufficient to support a minimum of 60 days of operating expenses through a combination of cash, accounts receivable and a \$250,000 revolving line of credit.

#### Note 12. COVID-19

On January 30, 2020, the World Health Organization declared the coronavirus outbreak (COVID-19) a "Public Health Emergency of International Concern" and on March 11, 2020, declared COVID-19 a pandemic. The extent to which COVID-19 impacts the operations of ALPI in the future will depend on future developments, which are highly uncertain and cannot be predicted with confidence, including the duration of the outbreak, new information that may emerge concerning the severity of COVID-19, the actions taken to contain COVID-19 or treat its impact, and the impact of each of these items on the economies and financial markets in the United States. In particular, the continued spread of COVID-19 could adversely impact ALPI's operations, including among others, grants and contracts revenue, and may have a material adverse effect on the financial condition, results of operations and cash flows of ALPI.

The Agricultural and Labor Program, Incorporated

Schedule of Expenditures of Federal Awards  
Year Ended June 30, 2021

Federal Grantor/Pass-Through Grantor/Program Title	Pass-Through Entity Identifying Number	Assistance Listing Number	Amount Provided to Subrecipients	Federal Expenditures
<b>Federal Awards:</b>				
U.S. Department of Health and Human Services:				
Direct program:				
Head Start	04CH011151	93.600	\$ -	\$ 8,983,990
COVID-19 - Head Start	04CH011151	93.600	-	529,609
COVID-19 - Head Start	04HE001038	93.600	-	117,347
<b>Program total</b>			-	<b>9,630,946</b>
U.S. Department of Health and Human Services				
passed through the following:				
State of Florida Department of Economic Opportunity:				
Low Income Home Energy Assistance	17EA-0F-07-63-08-001 / E1990	93.568	166,470	4,411,968
COVID-19 - Low Income Home Energy Assistance	17EA-0F-07-63-08-001	93.568	-	3,597,060
Senior Connection Center, Inc.:				
Low Income Home Energy Assistance	EH-19/20 / EH-2021	93.568	-	121,948
COVID-19 - Low Income Home Energy Assistance	EHCA-20/21	93.568	-	79,291
<b>Program total</b>			<b>166,470</b>	<b>8,210,267</b>
State of Florida Department of Economic Opportunity:				
Community Services Block Grant	17SB-0D-07-63-08-101 / E1990	93.569	45,723	783,232
COVID-19 - Community Services Block Grant	17SB-0D-07-63-08-101	93.569	-	698,241
<b>Program total</b>			<b>45,723</b>	<b>1,481,473</b>
U.S. Department of Agriculture passed through the				
State of Florida Department of Health:				
Child and Adult Care Food Program	S-501	10.558	-	59,560
Child and Adult Care Food Program	S-501	10.558	-	436,795
<b>Program total</b>			-	<b>496,355</b>

(Continued)

The Agricultural and Labor Program, Incorporated

Schedule of Expenditures of Federal Awards (Continued)  
Year Ended June 30, 2021

Federal Grantor/Pass-Through Grantor/Program Title	Pass-Through Entity Identifying Number	Assistance Listing Number	Amount Provided to Subrecipients	Federal Expenditures
<b>Federal Awards (Continued):</b>				
U.S. Department of Labor passed through the following:				
State of Florida Department of Education:				
Farmworker Jobs and Education Program	755-4050B-0CFE1	17.264	\$ -	1,872
Farmworker Jobs and Education Program	755-4059B-9CFE1	17.264	-	57,968
Florida Non-Profit Housing, Inc.:				
Farmworker Jobs and Education Program	None	17.264	-	34,725
<b>Program total</b>			-	<b>94,565</b>
U.S. Department of Housing and Urban Development:				
Direct program:				
Housing Counseling Assistance Program	HC19-0421-014	14.169	-	15,382
<b>Program total</b>			-	<b>15,382</b>
U.S. Department of Housing and Urban Development				
passed through the following:				
Hearland Coalition for the Homeless, Inc.:				
Emergency Solutions Grant Program	TPZ18	14.231	-	47,722
<b>Program total</b>			-	<b>47,722</b>
U.S. Department of the Treasury				
passed through the following:				
United Way of Central Florida, Inc.:				
Coronavirus Relief Fund	None	21.019	-	463,449
<b>Program total</b>			-	<b>463,449</b>
<b>Total expenditures of federal awards</b>			\$ 212,193	\$ 20,440,159

See notes to schedule of expenditures of federal awards.

## The Agricultural and Labor Program, Incorporated

### Notes to Schedule of Expenditures of Federal Awards Year Ended June 30, 2021

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#### **Note 1. Basis of Presentation**

The accompanying schedule of expenditures of federal awards (the Schedule) includes the federal award activity of The Agricultural and Labor Program, Incorporated (ALPI) under programs of the federal government for the year ended June 30, 2021. The information in this Schedule is presented in accordance with the requirements of Title 2 U.S. Code of Federal Regulations Part 200, *Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards* (Uniform Guidance). Because the Schedule presents only a selected portion of the operations of ALPI, it is not intended to and does not present the financial position, changes in net assets or cash flows of ALPI.

#### **Note 2. Summary of Significant Accounting Policies**

Expenditures reported on the Schedule are recognized on the accrual basis of accounting. Such expenditures are recognized following the cost principles contained in the Uniform Guidance, wherein certain types of expenditures are not allowable or are limited as to reimbursement.

#### **Note 3. Indirect Cost Rate**

Expenditures include indirect costs, related primarily to general administrative services, which are allocated to direct cost objectives (including federal awards) based on negotiated formulas commonly referred to as administrative cost rates. Administrative cost rates allocated to such awards for the year ended June 30, 2021, were based on fixed rates negotiated with ALPI's cognizant federal agency, the U.S. Department of Health and Human Services. Therefore, ALPI has elected not to use the 10% de minimis indirect cost rate as allowed under the Uniform Guidance.

#### **Note 4. Head Start Program**

ALPI operates full year Head Start/Early Head Start Programs. The Head Start/Early Head Start Programs provide comprehensive early child development for disadvantaged infants and preschool children and their families. Under these programs, ALPI is required to obtain matching revenue from private sources and in-kind contributions. ALPI did not obtain the required matching revenue and in-kind contributions for the year ended June 30, 2021, however, ALPI received a waiver from the U.S. Department of Health and Human Services.



RSM US LLP

**Report on Internal Control Over Financial Reporting and on Compliance  
and Other Matters Based on an Audit of Financial Statements Performed  
in Accordance With *Government Auditing Standards***

**Independent Auditor's Report**

Board of Directors  
The Agricultural and Labor Program, Incorporated

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, the financial statements of The Agricultural and Labor Program, Incorporated, which comprise the statement of financial position as of June 30, 2021, and the related statements of activities, functional expenses and cash flows for the year then ended, and the related notes to the financial statements, and have issued our report thereon dated January 11, 2022.

**Internal Control Over Financial Reporting**

In planning and performing our audit of the financial statements, we considered The Agricultural and Labor Program, Incorporated's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of The Agricultural and Labor Program, Incorporated's internal control. Accordingly, we do not express an opinion on the effectiveness of The Agricultural and Labor Program, Incorporated's internal control.

*A deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. *A material weakness* is a deficiency, or a 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. *A significant deficiency* is a deficiency, or a 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.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit, we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

**Compliance and Other Matters**

As part of obtaining reasonable assurance about whether The Agricultural and Labor Program, Incorporated's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

**Purpose of This Report**

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of The Agricultural and Labor Program, Incorporated's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering The Agricultural and Labor Program, Incorporated's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

*RSM US LLP*

Orlando, Florida  
January 11, 2022



RSM US LLP

**Report on Compliance for Each Major Federal  
Program and Report on Internal Control Over Compliance  
Required by the Uniform Guidance**

**Independent Auditor's Report**

Board of Directors  
The Agricultural and Labor Program, Incorporated

**Report on Compliance for Each Major Federal Program**

We have audited The Agricultural and Labor Program, Incorporated's compliance with the types of compliance requirements described in the OMB Compliance Supplement that could have a direct and material effect on each of The Agricultural and Labor Program, Incorporated's major federal programs for the year ended June 30, 2021. The Agricultural and Labor Program, Incorporated's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

**Management's Responsibility**

Management is responsible for compliance with federal statutes, regulations, and the terms and conditions of its federal awards applicable to its federal programs.

**Auditor's Responsibility**

Our responsibility is to express an opinion on compliance for each of The Agricultural and Labor Program, Incorporated's major federal programs based on our audit of the types of compliance requirements referred to above. We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; the audit requirements of Title 2 U.S. Code of Federal Regulations Part 200, *Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards* (Uniform Guidance). Those standards and the Uniform Guidance require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about The Agricultural and Labor Program, Incorporated's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

We believe that our audit provides a reasonable basis for our opinion on compliance for each major federal program. However, our audit does not provide a legal determination on The Agricultural and Labor Program, Incorporated's compliance.

**Opinion on Each Major Federal Program**

In our opinion, The Agricultural and Labor Program, Incorporated complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2021.

**Report on Internal Control Over Compliance**

Management of The Agricultural and Labor Program, Incorporated is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered The Agricultural and Labor Program, Incorporated's internal control over compliance with the types of requirements that could have a direct and material effect on each major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for each major federal program and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of The Agricultural and Labor Program, Incorporated's internal control over compliance.

*A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A material weakness in internal control over compliance is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. A significant deficiency in internal control over compliance is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.*

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

*RSM US LLP*

Orlando, Florida  
January 11, 2022

**The Agricultural and Labor Program, Incorporated**

**Schedule of Findings and Questioned Costs  
Year Ended June 30, 2021**

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**Section I. Summary of Auditor's Results**

**Financial Statements**

Type of report the auditor issued on whether the financial statements audited were prepared in accordance with U.S. GAAP:

Unmodified

Internal control over financial reporting:

Material weakness(es) identified?	_____ Yes	_____ X	No
Significant deficiency(ies) identified?	_____ Yes	_____ X	None Reported

Noncompliance material to financial statements noted?	_____ Yes	_____ X	No
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**Federal Awards**

Internal control over major programs:

Material weakness(es) identified?	_____ Yes	_____ X	No
Significant deficiency(ies) identified?	_____ Yes	_____ X	None Reported

Type of auditor's report issued on compliance for the major programs:

Unmodified

Any audit findings disclosed that are required to be reported in accordance with Section 2 CFR 200.516(a)?

_____ Yes	_____ X	No
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Identification of major programs:

**Assistance Listing Number(s)**

93.568  
21.019

**Name of Federal Program or Cluster**

Low Income Home Energy Assistance  
Coronavirus Relief Fund

Dollar threshold used to distinguish between Type A and type B programs:

\_\_\_\_\_ \$750,000

Auditee qualified as low-risk auditee?	_____ X	_____ Yes	_____ No
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**Section II. Financial Statement Findings**

No matters to report.

**Section III. Findings and Questioned Costs for Federal Awards**

No matters to report.

**Section IV. Other Reporting**

1. No Corrective Action Plan is presented because there were no findings required to be reported under the Federal Single Audit Act.
2. No Summary Schedule of Prior Audit Findings is presented because there were no prior audit findings.

Form **990**  
(Rev. January 2020)  
Department of the Treasury  
Internal Revenue Service

# Return of Organization Exempt From Income Tax

OMB No. 1545-0047

# 2019

Open to Public Inspection

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)

Do not enter social security numbers on this form as it may be made public.

Go to [www.irs.gov/Form990](http://www.irs.gov/Form990) for instructions and the latest information.

**A** For the **2019** calendar year, or tax year beginning **JUL 1, 2019** and ending **JUN 30, 2020**

<b>B</b> Check if applicable: <input type="checkbox"/> Address change <input type="checkbox"/> Name change <input type="checkbox"/> Initial return <input type="checkbox"/> Final return/terminated <input type="checkbox"/> Amended return <input type="checkbox"/> Application pending	<b>C</b> Name of organization THE AGRICULTURAL AND LABOR PROGRAM, INC.		<b>D</b> Employer identification number 59-1634148
	Doing business as		<b>E</b> Telephone number 863-956-3491
	Number and street (or P.O. box if mail is not delivered to street address)	Room/suite	
	P.O. BOX 3126		<b>G</b> Gross receipts \$ 15,171,903.
	City or town, state or province, country, and ZIP or foreign postal code WINTER HAVEN, FL 33885		
<b>F</b> Name and address of principal officer: ARLENE DOBISON SAME AS C ABOVE		<b>H(a)</b> Is this a group return for subordinates? ..... <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <b>H(b)</b> Are all subordinates included? <input type="checkbox"/> Yes <input type="checkbox"/> No If "No," attach a list. (see instructions) <b>H(c)</b> Group exemption number	

**I** Tax-exempt status:  501(c)(3)  501(c) ( ) (insert no.)  4947(a)(1) or  527

**J** Website: WWW.ALPI.ORG

**K** Form of organization:  Corporation  Trust  Association  Other **L** Year of formation: 1976 **M** State of legal domicile: FL

## Part I Summary

<b>Activities &amp; Governance</b>	<b>1</b> Briefly describe the organization's mission or most significant activities: TO PROVIDE ASSISTANCE TO MIGRANT & SEASONAL FARM WORKERS, THE RURAL POOR, & DISENFRANCHISED PERSONS.		
	<b>2</b> Check this box <input type="checkbox"/> if the organization discontinued its operations or disposed of more than 25% of its net assets.		
	<b>3</b> Number of voting members of the governing body (Part VI, line 1a)	<b>3</b>	21
	<b>4</b> Number of independent voting members of the governing body (Part VI, line 1b)	<b>4</b>	21
	<b>5</b> Total number of individuals employed in calendar year 2019 (Part V, line 2a)	<b>5</b>	254
	<b>6</b> Total number of volunteers (estimate if necessary)	<b>6</b>	1014
	<b>7 a</b> Total unrelated business revenue from Part VIII, column (C), line 12	<b>7a</b>	0.
<b>b</b> Net unrelated business taxable income from Form 990-T, line 39	<b>7b</b>	0.	
<b>Revenue</b>	<b>8</b> Contributions and grants (Part VIII, line 1h)	<b>Prior Year</b>	<b>Current Year</b>
	<b>9</b> Program service revenue (Part VIII, line 2g)	14,815,868.	15,100,374.
	<b>10</b> Investment income (Part VIII, column (A), lines 3, 4, and 7d)	54,462.	32,088.
	<b>11</b> Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)	27.	-2,466.
	<b>12</b> Total revenue - add lines 8 through 11 (must equal Part VIII, column (A), line 12)	37,463.	39,331.
		14,907,820.	15,169,327.
<b>Expenses</b>	<b>13</b> Grants and similar amounts paid (Part IX, column (A), lines 1-3)	3,288,525.	3,595,786.
	<b>14</b> Benefits paid to or for members (Part IX, column (A), line 4)	0.	0.
	<b>15</b> Salaries, other compensation, employee benefits (Part IX, column (A), lines 5-10)	8,145,555.	8,249,776.
	<b>16a</b> Professional fundraising fees (Part IX, column (A), line 11e)	0.	0.
	<b>b</b> Total fundraising expenses (Part IX, column (D), line 25)	0.	
	<b>17</b> Other expenses (Part IX, column (A), lines 11a-11d, 11f-24e)	3,048,508.	3,196,409.
	<b>18</b> Total expenses. Add lines 13-17 (must equal Part IX, column (A), line 25)	14,482,588.	15,041,971.
<b>19</b> Revenue less expenses. Subtract line 18 from line 12	425,232.	127,356.	
<b>Net Assets or Fund Balances</b>	<b>20</b> Total assets (Part X, line 16)	<b>Beginning of Current Year</b>	<b>End of Year</b>
	<b>21</b> Total liabilities (Part X, line 26)	3,574,178.	5,659,140.
	<b>22</b> Net assets or fund balances. Subtract line 21 from line 20	1,355,955.	3,313,561.
	2,218,223.	2,345,579.	

## Part II Signature Block

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

<b>Sign Here</b>	Signature of officer		Date		
	ARLENE DOBISON, CEO				
<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check if self-employed <input type="checkbox"/>	PTIN
	JULIANA KREUL	<i>Juliana Kreul</i>	04/22/21		P01204534
<b>Preparer Use Only</b>	Firm's name	Firm's EIN			
	RSM US LLP	42-0714325			
<b>Preparer Use Only</b>	Firm's address	Phone no.			
	7351 OFFICE PARK PLACE MELBOURNE, FL 32940-8229	321-751-6200			

May the IRS discuss this return with the preparer shown above? (see instructions)  **Page 713 of 803**

Part III Statement of Program Service Accomplishments

Check if Schedule O contains a response or note to any line in this Part III

1 Briefly describe the organization's mission: THE MISSION OF THE AGRICULTURAL AND LABOR PROGRAM INC. IS TO COLLABORATE WITH COMMUNITY PARTNERS AND DELIVER HUMAN SERVICE PROGRAMS THAT EMPOWER THE ECONOMICALLY DISADVANTAGED AND OTHERS TO BE SELF-SUFFICIENT.

2 Did the organization undertake any significant program services during the year which were not listed on the prior Form 990 or 990-EZ? Yes No

3 Did the organization cease conducting, or make significant changes in how it conducts, any program services? Yes No

4 Describe the organization's program service accomplishments for each of its three largest program services, as measured by expenses. Section 501(c)(3) and 501(c)(4) organizations are required to report the amount of grants and allocations to others, the total expenses, and revenue, if any, for each program service reported.

4a (Code: ) (Expenses \$ 7,234,234. including grants of \$ 324,384. ) (Revenue \$ 0. ) EARLY EDUCATION TRAINING (BIRTH TO 5 YEARS) OF CHILDREN UNDER THE HEAD START PROGRAM CONTRACTED WITH THE U.S. DEPT OF HEALTH AND HUMAN SERVICES. ESTIMATED ACTIVITY - 831 CHILDREN ENROLLED.

4b (Code: ) (Expenses \$ 5,190,237. including grants of \$ 3,271,402. ) (Revenue \$ 1,500. ) EMERGENCY ASSISTANCE PROGRAMS INCLUDING ENERGY, USDA RURAL DEVELOPMENT, AND FARM WORKER PROGRAMS UNDER CONTRACT FROM THE STATE OF FLORIDA DEPARTMENT OF EDUCATION. ESTIMATED ACTIVITY 23,512 CLIENTS SERVED

4c (Code: ) (Expenses \$ 1,530,691. including grants of \$ 0. ) (Revenue \$ 32,362. ) FOOD AND CHILD CARE CENTER ACTIVITIES PROVIDED BY CONTRACT FROM STATE OF FLORIDA DEPT OF HEALTH AND REHABILITATION SERVICES. ESTIMATED ACTIVITY - 831 CHILDREN FOR FOOD AND CHILD CARE ACTIVITIES.

4d Other program services (Describe on Schedule O.) (Expenses \$ including grants of \$ ) (Revenue \$ )

4e Total program service expenses 13,955,162.

Part IV Checklist of Required Schedules

Table with 3 columns: Question ID, Yes, No. Rows include questions 1 through 21, with sub-questions a-f for questions 11, 12, and 20. 'X' marks indicate 'Yes' responses for questions 1, 2, 11a, 11e, 11f, 12a, 18, 19, 20a, and 20b.

Part IV Checklist of Required Schedules (continued)

Table with 3 columns: Question ID, Question Text, Yes, No. Rows include questions 22 through 38 regarding organizational reporting, compensation, tax-exempt bonds, and business transactions.

Part V Statements Regarding Other IRS Filings and Tax Compliance

Check if Schedule O contains a response or note to any line in this Part V [ ]

Table with 3 columns: Question ID, Question Text, Yes, No. Rows include questions 1a, 1b, and c regarding Form 1096, Forms W-2G, and backup withholding rules.

Part V Statements Regarding Other IRS Filings and Tax Compliance (continued)

Table with columns for question number, question text, and Yes/No checkboxes. Includes questions 2a through 16 regarding employee counts, tax filings, and organizational compliance.

Part VI Governance, Management, and Disclosure For each "Yes" response to lines 2 through 7b below, and for a "No" response to line 8a, 8b, or 10b below, describe the circumstances, processes, or changes on Schedule O. See instructions.

Check if Schedule O contains a response or note to any line in this Part VI [X]

Section A. Governing Body and Management

Table with 3 columns: Question, Yes, No. Rows include 1a (governing body members), 1b (independent members), 2-7a (relationships and governance), 7b (reserved decisions), 8 (documentation), and 9 (unreachable officer).

Section B. Policies (This Section B requests information about policies not required by the Internal Revenue Code.)

Table with 3 columns: Question, Yes, No. Rows include 10a (local chapters), 10b (policies), 11a (copy of Form 990), 11b (review process), 12a-c (conflict of interest policy), 13 (whistleblower policy), 14 (document retention), 15 (compensation review), 15a-b (CEO/officers), 16a (joint venture), 16b (policy for joint ventures).

Section C. Disclosure

- 17 List the states with which a copy of this Form 990 is required to be filed FL
18 Section 6104 requires an organization to make its Forms 1023 (1024 or 1024-A, if applicable), 990, and 990-T (Section 501(c)(3)s only) available for public inspection.
19 Describe on Schedule O whether (and if so, how) the organization made its governing documents, conflict of interest policy, and financial statements available to the public during the tax year.
20 State the name, address, and telephone number of the person who possesses the organization's books and records DENNIS GNIEWEK - 863-956-3491 P.O. BOX 3126, WINTER HAVEN, FL 33885

**Part VII Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, and Independent Contractors**

Check if Schedule O contains a response or note to any line in this Part VII

**Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees**

**1a** Complete this table for all persons required to be listed. Report compensation for the calendar year ending with or within the organization's tax year.

- List all of the organization's **current** officers, directors, trustees (whether individuals or organizations), regardless of amount of compensation. Enter -0- in columns (D), (E), and (F) if no compensation was paid.
- List all of the organization's **current** key employees, if any. See instructions for definition of "key employee."
- List the organization's five **current** highest compensated employees (other than an officer, director, trustee, or key employee) who received reportable compensation (Box 5 of Form W-2 and/or Box 7 of Form 1099-MISC) of more than \$100,000 from the organization and any related organizations.
- List all of the organization's **former** officers, key employees, and highest compensated employees who received more than \$100,000 of reportable compensation from the organization and any related organizations.
- List all of the organization's **former directors or trustees** that received, in the capacity as a former director or trustee of the organization, more than \$10,000 of reportable compensation from the organization and any related organizations. See instructions for the order in which to list the persons above.

Check this box if neither the organization nor any related organization compensated any current officer, director, or trustee.

(A) Name and title	(B) Average hours per week (list any hours for related organizations below line)	(C) Position (do not check more than one box, unless person is both an officer and a director/trustee)						(D) Reportable compensation from the organization (W-2/1099-MISC)	(E) Reportable compensation from related organizations (W-2/1099-MISC)	(F) Estimated amount of other compensation from the organization and related organizations
		Individual trustee or director	Institutional trustee	Officer	Key employee	Highest compensated employee	Former			
(1) WILLIAM HOLT CHAIRPERSON	4.00	X		X			0.	0.	0.	
(2) STACY CAMPBELL-DOMINECK VICE CHAIRPERSON	4.00	X		X			0.	0.	0.	
(3) SHEILA DIXON SECRETARY	4.00	X		X			0.	0.	0.	
(4) PATRICIA GAMBLE TREASURER	4.00	X		X			0.	0.	0.	
(5) MARJORIE GASKIN DIRECTOR	4.00	X					0.	0.	0.	
(6) KATIE CLARKE DIRECTOR	4.00	X					0.	0.	0.	
(7) BRENDA GRAY DIRECTOR	4.00	X					0.	0.	0.	
(8) JOSEPHINE HOWARD DIRECTOR	4.00	X					0.	0.	0.	
(9) DAVID RUCKER DIRECTOR	4.00	X					0.	0.	0.	
(10) N'KOSI JONES DIRECTOR	4.00	X					0.	0.	0.	
(11) KIM JOHNSON DIRECTOR	4.00	X					0.	0.	0.	
(12) GLENDA JONES DIRECTOR	4.00	X					0.	0.	0.	
(13) VERNON MCQUEEN DIRECTOR	4.00	X					0.	0.	0.	
(14) CHESTER MCNORTON DIRECTOR	4.00	X					0.	0.	0.	
(15) KIMBERLY ROSS DIRECTOR	4.00	X					0.	0.	0.	
(16) RUBY WILLIX DIRECTOR	4.00	X					0.	0.	0.	
(17) BARBARA GRACE DIRECTOR (PART YEAR)	4.00	X					0.	0.	0.	

**Part VII Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees** (continued)

(A) Name and title	(B) Average hours per week (list any hours for related organizations below line)	(C) Position (do not check more than one box, unless person is both an officer and a director/trustee)						(D) Reportable compensation from the organization (W-2/1099-MISC)	(E) Reportable compensation from related organizations (W-2/1099-MISC)	(F) Estimated amount of other compensation from the organization and related organizations
		Individual trustee or director	Institutional trustee	Officer	Key employee	Highest compensated employee	Former			
(18) ANNETTE JONES ASST. SECRETARY/DIRECTOR	4.00	X					0.	0.	0.	
(19) YOLANDA ROBINSON DIRECTOR	4.00	X					0.	0.	0.	
(20) TONMIEL RODRIGUEZ DIRECTOR	4.00	X					0.	0.	0.	
(21) TIMOTHY STANLEY DIRECTOR	4.00	X					0.	0.	0.	
(22) ARLENE DOBISON CEO	40.00			X			125,012.	0.	12,144.	
(23) DENNIS GNIEWEK FINANCE DIRECTOR	40.00			X			72,180.	0.	13,793.	
<b>1b Subtotal</b>							197,192.	0.	25,937.	
<b>c Total from continuation sheets to Part VII, Section A</b>							0.	0.	0.	
<b>d Total (add lines 1b and 1c)</b>							197,192.	0.	25,937.	

2 Total number of individuals (including but not limited to those listed above) who received more than \$100,000 of reportable compensation from the organization 1

	Yes	No
3 Did the organization list any <b>former</b> officer, director, trustee, key employee, or highest compensated employee on line 1a? <i>If "Yes," complete Schedule J for such individual</i>		X
4 For any individual listed on line 1a, is the sum of reportable compensation and other compensation from the organization and related organizations greater than \$150,000? <i>If "Yes," complete Schedule J for such individual</i>		X
5 Did any person listed on line 1a receive or accrue compensation from any unrelated organization or individual for services rendered to the organization? <i>If "Yes," complete Schedule J for such person</i>		X

**Section B. Independent Contractors**

1 Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization. Report compensation for the calendar year ending with or within the organization's tax year.

(A) Name and business address	(B) Description of services	(C) Compensation
NONE		

2 Total number of independent contractors (including but not limited to those listed above) who received more than \$100,000 of compensation from the organization 0

**Part VIII Statement of Revenue**

Check if Schedule O contains a response or note to any line in this Part VIII

			(A)	(B)	(C)	(D)
			Total revenue	Related or exempt function revenue	Unrelated business revenue	Revenue excluded from tax under sections 512 - 514
Contributions, Gifts, Grants and Other Similar Amounts	<b>1 a</b>	Federated campaigns	<b>1a</b>			
	<b>b</b>	Membership dues	<b>1b</b>			
	<b>c</b>	Fundraising events	<b>1c</b>			
	<b>d</b>	Related organizations	<b>1d</b>			
	<b>e</b>	Government grants (contributions)	<b>1e</b>	13,967,417.		
	<b>f</b>	All other contributions, gifts, grants, and similar amounts not included above	<b>1f</b>	1,132,957.		
	<b>g</b>	Noncash contributions included in lines 1a-1f	<b>1g</b>	\$		
	<b>h</b>	<b>Total.</b> Add lines 1a-1f		15,100,374.		
Program Service Revenue	<b>2 a</b>	CHILD CARE FEES	Business Code			
			624410	30,588.	30,588.	
	<b>b</b>	TECHNICAL & EDUCATION	611430	1,500.	1,500.	
	<b>c</b>					
	<b>d</b>					
	<b>e</b>					
	<b>f</b>	All other program service revenue				
<b>g</b>	<b>Total.</b> Add lines 2a-2f		32,088.			
Other Revenue	<b>3</b>	Investment income (including dividends, interest, and other similar amounts)		110.		110.
	<b>4</b>	Income from investment of tax-exempt bond proceeds				
	<b>5</b>	Royalties				
	<b>6 a</b>	Gross rents	(i) Real			
			(ii) Personal			
	<b>b</b>	Less: rental expenses	<b>6b</b>			
	<b>c</b>	Rental income or (loss)	<b>6c</b>			
	<b>d</b>	Net rental income or (loss)				
	<b>7 a</b>	Gross amount from sales of assets other than inventory	(i) Securities			
			(ii) Other			
	<b>b</b>	Less: cost or other basis and sales expenses	<b>7b</b>	2,576.		
<b>c</b>	Gain or (loss)	<b>7c</b>	-2,576.			
<b>d</b>	Net gain or (loss)		-2,576.		-2,576.	
<b>8 a</b>	Gross income from fundraising events (not including \$ _____ of contributions reported on line 1c). See Part IV, line 18		37,557.			
		<b>8b</b>	0.			
		<b>c</b>	Net income or (loss) from fundraising events	37,557.		37,557.
<b>9 a</b>	Gross income from gaming activities. See Part IV, line 19					
		<b>9b</b>				
		<b>c</b>	Net income or (loss) from gaming activities			
<b>10 a</b>	Gross sales of inventory, less returns and allowances					
		<b>10b</b>				
		<b>c</b>	Net income or (loss) from sales of inventory			
Miscellaneous Revenue	<b>11 a</b>	OTHER REVENUE	Business Code			
			900099	1,774.	1,774.	
	<b>b</b>					
	<b>c</b>					
	<b>d</b>	All other revenue				
<b>e</b>	<b>Total.</b> Add lines 11a-11d		1,774.			
<b>12</b>	<b>Total revenue.</b> See instructions		15,169,327.	33,862.	0.	

**Part IX Statement of Functional Expenses**

Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must complete column (A).

Check if Schedule O contains a response or note to any line in this Part IX

Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part VIII.	(A) Total expenses	(B) Program service expenses	(C) Management and general expenses	(D) Fundraising expenses
<b>1</b> Grants and other assistance to domestic organizations and domestic governments. See Part IV, line 21 ...	324,384.	324,384.		
<b>2</b> Grants and other assistance to domestic individuals. See Part IV, line 22 .....	3,271,402.	3,271,402.		
<b>3</b> Grants and other assistance to foreign organizations, foreign governments, and foreign individuals. See Part IV, lines 15 and 16 .....				
<b>4</b> Benefits paid to or for members .....				
<b>5</b> Compensation of current officers, directors, trustees, and key employees .....	181,491.		181,491.	
<b>6</b> Compensation not included above to disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B) .....				
<b>7</b> Other salaries and wages .....	6,347,296.	5,889,849.	457,447.	
<b>8</b> Pension plan accruals and contributions (include section 401(k) and 403(b) employer contributions)	217,815.	195,906.	21,909.	
<b>9</b> Other employee benefits .....	1,054,055.	948,035.	106,020.	
<b>10</b> Payroll taxes .....	449,119.	403,945.	45,174.	
<b>11</b> Fees for services (nonemployees):				
<b>a</b> Management .....				
<b>b</b> Legal .....	33,247.	29,922.	3,325.	
<b>c</b> Accounting .....	59,957.	53,961.	5,996.	
<b>d</b> Lobbying .....				
<b>e</b> Professional fundraising services. See Part IV, line 17				
<b>f</b> Investment management fees .....				
<b>g</b> Other. (If line 11g amount exceeds 10% of line 25, column (A) amount, list line 11g expenses on Sch O.)	53,252.	47,927.	5,325.	
<b>12</b> Advertising and promotion .....	2,300.	2,300.		
<b>13</b> Office expenses .....	708,125.	637,312.	70,813.	
<b>14</b> Information technology .....	232,923.	209,631.	23,292.	
<b>15</b> Royalties .....				
<b>16</b> Occupancy .....	698,454.	628,608.	69,846.	
<b>17</b> Travel .....	195,304.	176,308.	18,996.	
<b>18</b> Payments of travel or entertainment expenses for any federal, state, or local public officials ...				
<b>19</b> Conferences, conventions, and meetings .....				
<b>20</b> Interest .....	3,366.		3,366.	
<b>21</b> Payments to affiliates .....				
<b>22</b> Depreciation, depletion, and amortization .....	163,564.	159,729.	3,835.	
<b>23</b> Insurance .....	144,085.	129,677.	14,408.	
<b>24</b> Other expenses. Itemize expenses not covered above (List miscellaneous expenses on line 24e. If line 24e amount exceeds 10% of line 25, column (A) amount, list line 24e expenses on Schedule O.)				
<b>a</b> FOOD	452,095.	452,095.		
<b>b</b> IN-SERVICE TRAINING	193,469.	158,645.	34,824.	
<b>c</b> EQUIPMENT RENTAL	144,690.	130,221.	14,469.	
<b>d</b> OTHER EXPENSES	82,941.	82,395.	546.	
<b>e</b> All other expenses	28,637.	22,910.	5,727.	
<b>25</b> Total functional expenses. Add lines 1 through 24e	15,041,971.	13,955,162.	1,086,809.	0.
<b>26</b> Joint costs. Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundraising solicitation.				

Check here  if following SOP 98-2 (ASC 958-720)

**Part X Balance Sheet**

Check if Schedule O contains a response or note to any line in this Part X

		(A) Beginning of year		(B) End of year
<b>Assets</b>	<b>1</b> Cash - non-interest-bearing .....	728,505.	<b>1</b>	2,012,047.
	<b>2</b> Savings and temporary cash investments .....	70,336.	<b>2</b>	70,326.
	<b>3</b> Pledges and grants receivable, net .....	1,708,249.	<b>3</b>	1,962,563.
	<b>4</b> Accounts receivable, net .....	5,800.	<b>4</b>	741.
	<b>5</b> Loans and other receivables from any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons .....		<b>5</b>	
	<b>6</b> Loans and other receivables from other disqualified persons (as defined under section 4958(f)(1)), and persons described in section 4958(c)(3)(B) .....		<b>6</b>	
	<b>7</b> Notes and loans receivable, net .....		<b>7</b>	
	<b>8</b> Inventories for sale or use .....		<b>8</b>	
	<b>9</b> Prepaid expenses and deferred charges .....	59,911.	<b>9</b>	417,260.
	<b>10a</b> Land, buildings, and equipment: cost or other basis. Complete Part VI of Schedule D .....	<b>10a</b> 5,225,016.		
	<b>b</b> Less: accumulated depreciation .....	<b>10b</b> 4,039,261.	990,929.	<b>10c</b> 1,185,755.
	<b>11</b> Investments - publicly traded securities .....		<b>11</b>	
	<b>12</b> Investments - other securities. See Part IV, line 11 .....		<b>12</b>	
	<b>13</b> Investments - program-related. See Part IV, line 11 .....		<b>13</b>	
	<b>14</b> Intangible assets .....		<b>14</b>	
	<b>15</b> Other assets. See Part IV, line 11 .....	10,448.	<b>15</b>	10,448.
<b>16 Total assets.</b> Add lines 1 through 15 (must equal line 33) .....	3,574,178.	<b>16</b>	5,659,140.	
<b>Liabilities</b>	<b>17</b> Accounts payable and accrued expenses .....	1,250,309.	<b>17</b>	2,281,327.
	<b>18</b> Grants payable .....		<b>18</b>	
	<b>19</b> Deferred revenue .....		<b>19</b>	
	<b>20</b> Tax-exempt bond liabilities .....		<b>20</b>	
	<b>21</b> Escrow or custodial account liability. Complete Part IV of Schedule D .....		<b>21</b>	
	<b>22</b> Loans and other payables to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons .....		<b>22</b>	
	<b>23</b> Secured mortgages and notes payable to unrelated third parties .....	80,444.	<b>23</b>	49,482.
	<b>24</b> Unsecured notes and loans payable to unrelated third parties .....		<b>24</b>	
	<b>25</b> Other liabilities (including federal income tax, payables to related third parties, and other liabilities not included on lines 17-24). Complete Part X of Schedule D .....	25,202.	<b>25</b>	982,752.
	<b>26 Total liabilities.</b> Add lines 17 through 25 .....	1,355,955.	<b>26</b>	3,313,561.
<b>Net Assets or Fund Balances</b>	<b>Organizations that follow FASB ASC 958, check here</b> <input checked="" type="checkbox"/> <b>and complete lines 27, 28, 32, and 33.</b>			
	<b>27</b> Net assets without donor restrictions .....	2,218,223.	<b>27</b>	2,345,579.
	<b>28</b> Net assets with donor restrictions .....		<b>28</b>	
	<b>Organizations that do not follow FASB ASC 958, check here</b> <input type="checkbox"/> <b>and complete lines 29 through 33.</b>			
	<b>29</b> Capital stock or trust principal, or current funds .....		<b>29</b>	
	<b>30</b> Paid-in or capital surplus, or land, building, or equipment fund .....		<b>30</b>	
	<b>31</b> Retained earnings, endowment, accumulated income, or other funds .....		<b>31</b>	
	<b>32</b> Total net assets or fund balances .....	2,218,223.	<b>32</b>	2,345,579.
<b>33</b> Total liabilities and net assets/fund balances .....	3,574,178.	<b>33</b>	5,659,140.	

**Part XI Reconciliation of Net Assets**

Check if Schedule O contains a response or note to any line in this Part XI

<b>1</b>	Total revenue (must equal Part VIII, column (A), line 12)	<b>1</b>	15,169,327.
<b>2</b>	Total expenses (must equal Part IX, column (A), line 25)	<b>2</b>	15,041,971.
<b>3</b>	Revenue less expenses. Subtract line 2 from line 1	<b>3</b>	127,356.
<b>4</b>	Net assets or fund balances at beginning of year (must equal Part X, line 32, column (A))	<b>4</b>	2,218,223.
<b>5</b>	Net unrealized gains (losses) on investments	<b>5</b>	
<b>6</b>	Donated services and use of facilities	<b>6</b>	
<b>7</b>	Investment expenses	<b>7</b>	
<b>8</b>	Prior period adjustments	<b>8</b>	
<b>9</b>	Other changes in net assets or fund balances (explain on Schedule O)	<b>9</b>	0.
<b>10</b>	Net assets or fund balances at end of year. Combine lines 3 through 9 (must equal Part X, line 32, column (B))	<b>10</b>	2,345,579.

**Part XII Financial Statements and Reporting**

Check if Schedule O contains a response or note to any line in this Part XII

- 1** Accounting method used to prepare the Form 990:  Cash  Accrual  Other \_\_\_\_\_  
If the organization changed its method of accounting from a prior year or checked "Other," explain in Schedule O.
- 2a** Were the organization's financial statements compiled or reviewed by an independent accountant? .....  
If "Yes," check a box below to indicate whether the financial statements for the year were compiled or reviewed on a separate basis, consolidated basis, or both:  
 Separate basis  Consolidated basis  Both consolidated and separate basis
- b** Were the organization's financial statements audited by an independent accountant? .....  
If "Yes," check a box below to indicate whether the financial statements for the year were audited on a separate basis, consolidated basis, or both:  
 Separate basis  Consolidated basis  Both consolidated and separate basis
- c** If "Yes" to line 2a or 2b, does the organization have a committee that assumes responsibility for oversight of the audit, review, or compilation of its financial statements and selection of an independent accountant? .....  
If the organization changed either its oversight process or selection process during the tax year, explain on Schedule O.
- 3a** As a result of a federal award, was the organization required to undergo an audit or audits as set forth in the Single Audit Act and OMB Circular A-133? .....
- b** If "Yes," did the organization undergo the required audit or audits? If the organization did not undergo the required audit or audits, explain why on Schedule O and describe any steps taken to undergo such audits .....

	Yes	No
<b>2a</b>		X
<b>2b</b>	X	
<b>2c</b>	X	
<b>3a</b>	X	
<b>3b</b>	X	



**Part II Support Schedule for Organizations Described in Sections 170(b)(1)(A)(iv) and 170(b)(1)(A)(vi)**

(Complete only if you checked the box on line 5, 7, or 8 of Part I or if the organization failed to qualify under Part III. If the organization fails to qualify under the tests listed below, please complete Part III.)

**Section A. Public Support**

Calendar year (or fiscal year beginning in) ▶	(a) 2015	(b) 2016	(c) 2017	(d) 2018	(e) 2019	(f) Total
<b>1</b> Gifts, grants, contributions, and membership fees received. (Do not include any "unusual grants.") .....	14,920,213.	14,549,723.	14,792,757.	14,815,868.	15,100,374.	74,178,935.
<b>2</b> Tax revenues levied for the organization's benefit and either paid to or expended on its behalf .....						
<b>3</b> The value of services or facilities furnished by a governmental unit to the organization without charge .....						
<b>4 Total.</b> Add lines 1 through 3 .....	14,920,213.	14,549,723.	14,792,757.	14,815,868.	15,100,374.	74,178,935.
<b>5</b> The portion of total contributions by each person (other than a governmental unit or publicly supported organization) included on line 1 that exceeds 2% of the amount shown on line 11, column (f) .....						
<b>6 Public support.</b> Subtract line 5 from line 4.						74,178,935.

**Section B. Total Support**

Calendar year (or fiscal year beginning in) ▶	(a) 2015	(b) 2016	(c) 2017	(d) 2018	(e) 2019	(f) Total
<b>7</b> Amounts from line 4 .....	14,920,213.	14,549,723.	14,792,757.	14,815,868.	15,100,374.	74,178,935.
<b>8</b> Gross income from interest, dividends, payments received on securities loans, rents, royalties, and income from similar sources .....	606.	373.	614.	430.	110.	2,133.
<b>9</b> Net income from unrelated business activities, whether or not the business is regularly carried on .....						
<b>10</b> Other income. Do not include gain or loss from the sale of capital assets (Explain in Part VI.) .....	37,415.	46,979.	38,714.	37,373.	33,862.	194,343.
<b>11 Total support.</b> Add lines 7 through 10						74,375,411.
<b>12</b> Gross receipts from related activities, etc. (see instructions) .....					12	205,396.
<b>13 First five years.</b> If the Form 990 is for the organization's first, second, third, fourth, or fifth tax year as a section 501(c)(3) organization, check this box and <b>stop here</b> .....						<input type="checkbox"/>

**Section C. Computation of Public Support Percentage**

<b>14</b> Public support percentage for 2019 (line 6, column (f) divided by line 11, column (f)) .....	<b>14</b>	99.74 %
<b>15</b> Public support percentage from 2018 Schedule A, Part II, line 14 .....	<b>15</b>	99.74 %
<b>16a 33 1/3% support test - 2019.</b> If the organization did not check the box on line 13, and line 14 is 33 1/3% or more, check this box and <b>stop here.</b> The organization qualifies as a publicly supported organization .....		<input checked="" type="checkbox"/>
<b>b 33 1/3% support test - 2018.</b> If the organization did not check a box on line 13 or 16a, and line 15 is 33 1/3% or more, check this box and <b>stop here.</b> The organization qualifies as a publicly supported organization .....		<input type="checkbox"/>
<b>17a 10% -facts-and-circumstances test - 2019.</b> If the organization did not check a box on line 13, 16a, or 16b, and line 14 is 10% or more, and if the organization meets the "facts-and-circumstances" test, check this box and <b>stop here.</b> Explain in Part VI how the organization meets the "facts-and-circumstances" test. The organization qualifies as a publicly supported organization .....		<input type="checkbox"/>
<b>b 10% -facts-and-circumstances test - 2018.</b> If the organization did not check a box on line 13, 16a, 16b, or 17a, and line 15 is 10% or more, and if the organization meets the "facts-and-circumstances" test, check this box and <b>stop here.</b> Explain in Part VI how the organization meets the "facts-and-circumstances" test. The organization qualifies as a publicly supported organization .....		<input type="checkbox"/>
<b>18 Private foundation.</b> If the organization did not check a box on line 13, 16a, 16b, 17a, or 17b, check this box and see instructions .....		<input type="checkbox"/>

**Part III Support Schedule for Organizations Described in Section 509(a)(2)**

(Complete only if you checked the box on line 10 of Part I or if the organization failed to qualify under Part II. If the organization fails to qualify under the tests listed below, please complete Part II.)

**Section A. Public Support**

Calendar year (or fiscal year beginning in) ►	(a) 2015	(b) 2016	(c) 2017	(d) 2018	(e) 2019	(f) Total
<b>1</b> Gifts, grants, contributions, and membership fees received. (Do not include any "unusual grants.") .....						
<b>2</b> Gross receipts from admissions, merchandise sold or services performed, or facilities furnished in any activity that is related to the organization's tax-exempt purpose .....						
<b>3</b> Gross receipts from activities that are not an unrelated trade or business under section 513 .....						
<b>4</b> Tax revenues levied for the organization's benefit and either paid to or expended on its behalf .....						
<b>5</b> The value of services or facilities furnished by a governmental unit to the organization without charge .....						
<b>6 Total.</b> Add lines 1 through 5 .....						
<b>7a</b> Amounts included on lines 1, 2, and 3 received from disqualified persons .....						
<b>b</b> Amounts included on lines 2 and 3 received from other than disqualified persons that exceed the greater of \$5,000 or 1% of the amount on line 13 for the year .....						
<b>c</b> Add lines 7a and 7b .....						
<b>8 Public support.</b> (Subtract line 7c from line 6.)						

**Section B. Total Support**

Calendar year (or fiscal year beginning in) ►	(a) 2015	(b) 2016	(c) 2017	(d) 2018	(e) 2019	(f) Total
<b>9</b> Amounts from line 6 .....						
<b>10a</b> Gross income from interest, dividends, payments received on securities loans, rents, royalties, and income from similar sources .....						
<b>b</b> Unrelated business taxable income (less section 511 taxes) from businesses acquired after June 30, 1975 .....						
<b>c</b> Add lines 10a and 10b .....						
<b>11</b> Net income from unrelated business activities not included in line 10b, whether or not the business is regularly carried on .....						
<b>12</b> Other income. Do not include gain or loss from the sale of capital assets (Explain in Part VI.) .....						
<b>13 Total support.</b> (Add lines 9, 10c, 11, and 12.)						

**14 First five years.** If the Form 990 is for the organization's first, second, third, fourth, or fifth tax year as a section 501(c)(3) organization, check this box and **stop here** .....

**Section C. Computation of Public Support Percentage**

<b>15</b> Public support percentage for 2019 (line 8, column (f), divided by line 13, column (f)) .....	<b>15</b>	%
<b>16</b> Public support percentage from 2018 Schedule A, Part III, line 15 .....	<b>16</b>	%

**Section D. Computation of Investment Income Percentage**

<b>17</b> Investment income percentage for 2019 (line 10c, column (f), divided by line 13, column (f)) .....	<b>17</b>	%
<b>18</b> Investment income percentage from 2018 Schedule A, Part III, line 17 .....	<b>18</b>	%

**19a 33 1/3% support tests - 2019.** If the organization did not check the box on line 14, and line 15 is more than 33 1/3%, and line 17 is not more than 33 1/3%, check this box and **stop here**. The organization qualifies as a publicly supported organization .....

**b 33 1/3% support tests - 2018.** If the organization did not check a box on line 14 or line 19a, and line 16 is more than 33 1/3%, and line 18 is not more than 33 1/3%, check this box and **stop here**. The organization qualifies as a publicly supported organization .....

**20 Private foundation.** If the organization did not check a box on line 14, 19a, or 19b, check this box and see instructions .....

**Part IV Supporting Organizations**

(Complete only if you checked a box in line 12 on Part I. If you checked 12a of Part I, complete Sections A and B. If you checked 12b of Part I, complete Sections A and C. If you checked 12c of Part I, complete Sections A, D, and E. If you checked 12d of Part I, complete Sections A and D, and complete Part V.)

**Section A. All Supporting Organizations**

	Yes	No
<b>1</b> Are all of the organization's supported organizations listed by name in the organization's governing documents? <i>If "No," describe in Part VI how the supported organizations are designated. If designated by class or purpose, describe the designation. If historic and continuing relationship, explain.</i>		
<b>2</b> Did the organization have any supported organization that does not have an IRS determination of status under section 509(a)(1) or (2)? <i>If "Yes," explain in Part VI how the organization determined that the supported organization was described in section 509(a)(1) or (2).</i>		
<b>3a</b> Did the organization have a supported organization described in section 501(c)(4), (5), or (6)? <i>If "Yes," answer (b) and (c) below.</i>		
<b>b</b> Did the organization confirm that each supported organization qualified under section 501(c)(4), (5), or (6) and satisfied the public support tests under section 509(a)(2)? <i>If "Yes," describe in Part VI when and how the organization made the determination.</i>		
<b>c</b> Did the organization ensure that all support to such organizations was used exclusively for section 170(c)(2)(B) purposes? <i>If "Yes," explain in Part VI what controls the organization put in place to ensure such use.</i>		
<b>4a</b> Was any supported organization not organized in the United States ("foreign supported organization")? <i>If "Yes," and if you checked 12a or 12b in Part I, answer (b) and (c) below.</i>		
<b>b</b> Did the organization have ultimate control and discretion in deciding whether to make grants to the foreign supported organization? <i>If "Yes," describe in Part VI how the organization had such control and discretion despite being controlled or supervised by or in connection with its supported organizations.</i>		
<b>c</b> Did the organization support any foreign supported organization that does not have an IRS determination under sections 501(c)(3) and 509(a)(1) or (2)? <i>If "Yes," explain in Part VI what controls the organization used to ensure that all support to the foreign supported organization was used exclusively for section 170(c)(2)(B) purposes.</i>		
<b>5a</b> Did the organization add, substitute, or remove any supported organizations during the tax year? <i>If "Yes," answer (b) and (c) below (if applicable). Also, provide detail in Part VI, including (i) the names and EIN numbers of the supported organizations added, substituted, or removed; (ii) the reasons for each such action; (iii) the authority under the organization's organizing document authorizing such action; and (iv) how the action was accomplished (such as by amendment to the organizing document).</i>		
<b>b Type I or Type II only.</b> Was any added or substituted supported organization part of a class already designated in the organization's organizing document?		
<b>c Substitutions only.</b> Was the substitution the result of an event beyond the organization's control?		
<b>6</b> Did the organization provide support (whether in the form of grants or the provision of services or facilities) to anyone other than (i) its supported organizations, (ii) individuals that are part of the charitable class benefited by one or more of its supported organizations, or (iii) other supporting organizations that also support or benefit one or more of the filing organization's supported organizations? <i>If "Yes," provide detail in Part VI.</i>		
<b>7</b> Did the organization provide a grant, loan, compensation, or other similar payment to a substantial contributor (as defined in section 4958(c)(3)(C)), a family member of a substantial contributor, or a 35% controlled entity with regard to a substantial contributor? <i>If "Yes," complete Part I of Schedule L (Form 990 or 990-EZ).</i>		
<b>8</b> Did the organization make a loan to a disqualified person (as defined in section 4958) not described in line 7? <i>If "Yes," complete Part I of Schedule L (Form 990 or 990-EZ).</i>		
<b>9a</b> Was the organization controlled directly or indirectly at any time during the tax year by one or more disqualified persons as defined in section 4946 (other than foundation managers and organizations described in section 509(a)(1) or (2))? <i>If "Yes," provide detail in Part VI.</i>		
<b>b</b> Did one or more disqualified persons (as defined in line 9a) hold a controlling interest in any entity in which the supporting organization had an interest? <i>If "Yes," provide detail in Part VI.</i>		
<b>c</b> Did a disqualified person (as defined in line 9a) have an ownership interest in, or derive any personal benefit from, assets in which the supporting organization also had an interest? <i>If "Yes," provide detail in Part VI.</i>		
<b>10a</b> Was the organization subject to the excess business holdings rules of section 4943 because of section 4943(f) (regarding certain Type II supporting organizations, and all Type III non-functionally integrated supporting organizations)? <i>If "Yes," answer 10b below.</i>		
<b>b</b> Did the organization have any excess business holdings in the tax year? <i>(Use Schedule C, Form 4720, to determine whether the organization had excess business holdings.)</i>		

**Part IV Supporting Organizations** (continued)

	Yes	No
<b>11</b> Has the organization accepted a gift or contribution from any of the following persons?		
<b>a</b> A person who directly or indirectly controls, either alone or together with persons described in (b) and (c) below, the governing body of a supported organization?		
<b>b</b> A family member of a person described in (a) above?		
<b>c</b> A 35% controlled entity of a person described in (a) or (b) above? <i>If "Yes" to a, b, or c, provide detail in Part VI.</i>		

**Section B. Type I Supporting Organizations**

	Yes	No
<b>1</b> Did the directors, trustees, or membership of one or more supported organizations have the power to regularly appoint or elect at least a majority of the organization's directors or trustees at all times during the tax year? <i>If "No," describe in Part VI how the supported organization(s) effectively operated, supervised, or controlled the organization's activities. If the organization had more than one supported organization, describe how the powers to appoint and/or remove directors or trustees were allocated among the supported organizations and what conditions or restrictions, if any, applied to such powers during the tax year.</i>		
<b>2</b> Did the organization operate for the benefit of any supported organization other than the supported organization(s) that operated, supervised, or controlled the supporting organization? <i>If "Yes," explain in Part VI how providing such benefit carried out the purposes of the supported organization(s) that operated, supervised, or controlled the supporting organization.</i>		

**Section C. Type II Supporting Organizations**

	Yes	No
<b>1</b> Were a majority of the organization's directors or trustees during the tax year also a majority of the directors or trustees of each of the organization's supported organization(s)? <i>If "No," describe in Part VI how control or management of the supporting organization was vested in the same persons that controlled or managed the supported organization(s).</i>		

**Section D. All Type III Supporting Organizations**

	Yes	No
<b>1</b> Did the organization provide to each of its supported organizations, by the last day of the fifth month of the organization's tax year, (i) a written notice describing the type and amount of support provided during the prior tax year, (ii) a copy of the Form 990 that was most recently filed as of the date of notification, and (iii) copies of the organization's governing documents in effect on the date of notification, to the extent not previously provided?		
<b>2</b> Were any of the organization's officers, directors, or trustees either (i) appointed or elected by the supported organization(s) or (ii) serving on the governing body of a supported organization? <i>If "No," explain in Part VI how the organization maintained a close and continuous working relationship with the supported organization(s).</i>		
<b>3</b> By reason of the relationship described in (2), did the organization's supported organizations have a significant voice in the organization's investment policies and in directing the use of the organization's income or assets at all times during the tax year? <i>If "Yes," describe in Part VI the role the organization's supported organizations played in this regard.</i>		

**Section E. Type III Functionally Integrated Supporting Organizations**

<b>1</b> Check the box next to the method that the organization used to satisfy the Integral Part Test during the year (see instructions).		
<b>a</b> <input type="checkbox"/> The organization satisfied the Activities Test. Complete line 2 below.		
<b>b</b> <input type="checkbox"/> The organization is the parent of each of its supported organizations. Complete line 3 below.		
<b>c</b> <input type="checkbox"/> The organization supported a governmental entity. Describe in Part VI how you supported a government entity (see instructions).		
<b>2</b> Activities Test. Answer (a) and (b) below.		
<b>a</b> Did substantially all of the organization's activities during the tax year directly further the exempt purposes of the supported organization(s) to which the organization was responsive? <i>If "Yes," then in Part VI identify those supported organizations and explain how these activities directly furthered their exempt purposes, how the organization was responsive to those supported organizations, and how the organization determined that these activities constituted substantially all of its activities.</i>		
<b>b</b> Did the activities described in (a) constitute activities that, but for the organization's involvement, one or more of the organization's supported organization(s) would have been engaged in? <i>If "Yes," explain in Part VI the reasons for the organization's position that its supported organization(s) would have engaged in these activities but for the organization's involvement.</i>		
<b>3</b> Parent of Supported Organizations. Answer (a) and (b) below.		
<b>a</b> Did the organization have the power to regularly appoint or elect a majority of the officers, directors, or trustees of each of the supported organizations? <i>Provide details in Part VI.</i>		
<b>b</b> Did the organization exercise a substantial degree of direction over the policies, programs, and activities of each of its supported organizations? <i>If "Yes," describe in Part VI the role played by the organization in this regard.</i>		

**Part V Type III Non-Functionally Integrated 509(a)(3) Supporting Organizations**

1  Check here if the organization satisfied the Integral Part Test as a qualifying trust on Nov. 20, 1970 (explain in Part VI). **See instructions.** All other Type III non-functionally integrated supporting organizations must complete Sections A through E.

Section A - Adjusted Net Income		(A) Prior Year	(B) Current Year (optional)
1	Net short-term capital gain	1	
2	Recoveries of prior-year distributions	2	
3	Other gross income (see instructions)	3	
4	Add lines 1 through 3.	4	
5	Depreciation and depletion	5	
6	Portion of operating expenses paid or incurred for production or collection of gross income or for management, conservation, or maintenance of property held for production of income (see instructions)	6	
7	Other expenses (see instructions)	7	
8	<b>Adjusted Net Income</b> (subtract lines 5, 6, and 7 from line 4)	8	

Section B - Minimum Asset Amount		(A) Prior Year	(B) Current Year (optional)
1	Aggregate fair market value of all non-exempt-use assets (see instructions for short tax year or assets held for part of year):		
a	Average monthly value of securities	1a	
b	Average monthly cash balances	1b	
c	Fair market value of other non-exempt-use assets	1c	
d	<b>Total</b> (add lines 1a, 1b, and 1c)	1d	
e	<b>Discount</b> claimed for blockage or other factors (explain in detail in <b>Part VI</b> ):		
2	Acquisition indebtedness applicable to non-exempt-use assets	2	
3	Subtract line 2 from line 1d.	3	
4	Cash deemed held for exempt use. Enter 1-1/2% of line 3 (for greater amount, see instructions).	4	
5	Net value of non-exempt-use assets (subtract line 4 from line 3)	5	
6	Multiply line 5 by .035.	6	
7	Recoveries of prior-year distributions	7	
8	<b>Minimum Asset Amount</b> (add line 7 to line 6)	8	

Section C - Distributable Amount			Current Year
1	Adjusted net income for prior year (from Section A, line 8, Column A)	1	
2	Enter 85% of line 1.	2	
3	Minimum asset amount for prior year (from Section B, line 8, Column A)	3	
4	Enter greater of line 2 or line 3.	4	
5	Income tax imposed in prior year	5	
6	<b>Distributable Amount.</b> Subtract line 5 from line 4, unless subject to emergency temporary reduction (see instructions).	6	
7	<input type="checkbox"/> Check here if the current year is the organization's first as a non-functionally integrated Type III supporting organization (see instructions).		

**Part V Type III Non-Functionally Integrated 509(a)(3) Supporting Organizations** (continued)

Section D - Distributions	Current Year
<b>1</b> Amounts paid to supported organizations to accomplish exempt purposes	
<b>2</b> Amounts paid to perform activity that directly furthers exempt purposes of supported organizations, in excess of income from activity	
<b>3</b> Administrative expenses paid to accomplish exempt purposes of supported organizations	
<b>4</b> Amounts paid to acquire exempt-use assets	
<b>5</b> Qualified set-aside amounts (prior IRS approval required)	
<b>6</b> Other distributions (describe in <b>Part VI</b> ). See instructions.	
<b>7 Total annual distributions.</b> Add lines 1 through 6.	
<b>8</b> Distributions to attentive supported organizations to which the organization is responsive (provide details in <b>Part VI</b> ). See instructions.	
<b>9</b> Distributable amount for 2019 from Section C, line 6	
<b>10</b> Line 8 amount divided by line 9 amount	

Section E - Distribution Allocations (see instructions)	(i) Excess Distributions	(ii) Underdistributions Pre-2019	(iii) Distributable Amount for 2019
<b>1</b> Distributable amount for 2019 from Section C, line 6			
<b>2</b> Underdistributions, if any, for years prior to 2019 (reasonable cause required- explain in <b>Part VI</b> ). See instructions.			
<b>3</b> Excess distributions carryover, if any, to 2019			
<b>a</b> From 2014			
<b>b</b> From 2015			
<b>c</b> From 2016			
<b>d</b> From 2017			
<b>e</b> From 2018			
<b>f Total</b> of lines 3a through e			
<b>g</b> Applied to underdistributions of prior years			
<b>h</b> Applied to 2019 distributable amount			
<b>i</b> Carryover from 2014 not applied (see instructions)			
<b>j</b> Remainder. Subtract lines 3g, 3h, and 3i from 3f.			
<b>4</b> Distributions for 2019 from Section D, line 7: \$			
<b>a</b> Applied to underdistributions of prior years			
<b>b</b> Applied to 2019 distributable amount			
<b>c</b> Remainder. Subtract lines 4a and 4b from 4.			
<b>5</b> Remaining underdistributions for years prior to 2019, if any. Subtract lines 3g and 4a from line 2. For result greater than zero, explain in <b>Part VI</b> . See instructions.			
<b>6</b> Remaining underdistributions for 2019. Subtract lines 3h and 4b from line 1. For result greater than zero, explain in <b>Part VI</b> . See instructions.			
<b>7 Excess distributions carryover to 2020.</b> Add lines 3j and 4c.			
<b>8</b> Breakdown of line 7:			
<b>a</b> Excess from 2015			
<b>b</b> Excess from 2016			
<b>c</b> Excess from 2017			
<b>d</b> Excess from 2018			
<b>e</b> Excess from 2019			

**Part VI**

**Supplemental Information.** Provide the explanations required by Part II, line 10; Part II, line 17a or 17b; Part III, line 12; Part IV, Section A, lines 1, 2, 3b, 3c, 4b, 4c, 5a, 6, 9a, 9b, 9c, 11a, 11b, and 11c; Part IV, Section B, lines 1 and 2; Part IV, Section C, line 1; Part IV, Section D, lines 2 and 3; Part IV, Section E, lines 1c, 2a, 2b, 3a, and 3b; Part V, line 1; Part V, Section B, line 1e; Part V, Section D, lines 5, 6, and 8; and Part V, Section E, lines 2, 5, and 6. Also complete this part for any additional information.  
(See instructions.)

SCHEDULE A, PART II, LINE 10, EXPLANATION FOR OTHER INCOME:

OTHER REVENUE

2015 AMOUNT: \$ 676.

2016 AMOUNT: \$ 2,371.

2017 AMOUNT: \$ 1,613.

2018 AMOUNT: \$ 24.

2019 AMOUNT: \$ 1,774.

FUNDRAISING EVENTS

2015 AMOUNT: \$ 36,739.

2016 AMOUNT: \$ 44,608.

2017 AMOUNT: \$ 37,101.

2018 AMOUNT: \$ 37,349.

2019 AMOUNT: \$ 32,088.

**Schedule B**

(Form 990, 990-EZ, or 990-PF)

Department of the Treasury  
Internal Revenue Service

**Schedule of Contributors**

▶ Attach to Form 990, Form 990-EZ, or Form 990-PF.  
▶ Go to [www.irs.gov/Form990](http://www.irs.gov/Form990) for the latest information.

OMB No. 1545-0047

**2019**

Name of the organization

THE AGRICULTURAL AND LABOR PROGRAM, INC.

Employer identification number

59-1634148

Organization type (check one):

**Filers of:**

**Section:**

Form 990 or 990-EZ

501(c)( 3 ) (enter number) organization

4947(a)(1) nonexempt charitable trust **not** treated as a private foundation

527 political organization

Form 990-PF

501(c)(3) exempt private foundation

4947(a)(1) nonexempt charitable trust treated as a private foundation

501(c)(3) taxable private foundation

Check if your organization is covered by the **General Rule** or a **Special Rule**.

**Note:** Only a section 501(c)(7), (8), or (10) organization can check boxes for both the General Rule and a Special Rule. See instructions.

**General Rule**

For an organization filing Form 990, 990-EZ, or 990-PF that received, during the year, contributions totaling \$5,000 or more (in money or property) from any one contributor. Complete Parts I and II. See instructions for determining a contributor's total contributions.

**Special Rules**

For an organization described in section 501(c)(3) filing Form 990 or 990-EZ that met the 33 1/3% support test of the regulations under sections 509(a)(1) and 170(b)(1)(A)(vi), that checked Schedule A (Form 990 or 990-EZ), Part II, line 13, 16a, or 16b, and that received from any one contributor, during the year, total contributions of the greater of **(1)** \$5,000; or **(2)** 2% of the amount on (i) Form 990, Part VIII, line 1h; or (ii) Form 990-EZ, line 1. Complete Parts I and II.

For an organization described in section 501(c)(7), (8), or (10) filing Form 990 or 990-EZ that received from any one contributor, during the year, total contributions of more than \$1,000 *exclusively* for religious, charitable, scientific, literary, or educational purposes, or for the prevention of cruelty to children or animals. Complete Parts I, II, and III.

For an organization described in section 501(c)(7), (8), or (10) filing Form 990 or 990-EZ that received from any one contributor, during the year, contributions *exclusively* for religious, charitable, etc., purposes, but no such contributions totaled more than \$1,000. If this box is checked, enter here the total contributions that were received during the year for an *exclusively* religious, charitable, etc., purpose. Don't complete any of the parts unless the **General Rule** applies to this organization because it received *nonexclusively* religious, charitable, etc., contributions totaling \$5,000 or more during the year ..... ▶ \$ \_\_\_\_\_

**Caution:** An organization that isn't covered by the General Rule and/or the Special Rules doesn't file Schedule B (Form 990, 990-EZ, or 990-PF), but it **must** answer "No" on Part IV, line 2, of its Form 990; or check the box on line H of its Form 990-EZ or on its Form 990-PF, Part I, line 2, to certify that it doesn't meet the filing requirements of Schedule B (Form 990, 990-EZ, or 990-PF).

Name of organization  <b>THE AGRICULTURAL AND LABOR PROGRAM, INC.</b>	<b>Employer identification number</b>  59-1634148
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**Part I Contributors** (see instructions). Use duplicate copies of Part I if additional space is needed.

(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
1	<hr/> <hr/> <hr/>	\$ 8,043,511.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
2	<hr/> <hr/> <hr/>	\$ 909,691.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
3	<hr/> <hr/> <hr/>	\$ 4,890,492.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
4	<hr/> <hr/> <hr/>	\$ 622,758.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
<hr/> <hr/> <hr/>	<hr/> <hr/> <hr/>	\$ _____	Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
<hr/> <hr/> <hr/>	<hr/> <hr/> <hr/>	\$ _____	Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)

Name of organization  <b>THE AGRICULTURAL AND LABOR PROGRAM, INC.</b>	<b>Employer identification number</b>  59-1634148
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**Part II Noncash Property** (see instructions). Use duplicate copies of Part II if additional space is needed.

(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions.)	(d) Date received
		\$ _____	
		\$ _____	
		\$ _____	
		\$ _____	
		\$ _____	
		\$ _____	
		\$ _____	

Name of organization  THE AGRICULTURAL AND LABOR PROGRAM, INC.	Employer identification number  59-1634148
--	--

**Part III** Exclusively religious, charitable, etc., contributions to organizations described in section 501(c)(7), (8), or (10) that total more than \$1,000 for the year from any one contributor. Complete columns (a) through (e) and the following line entry. For organizations completing Part III, enter the total of exclusively religious, charitable, etc., contributions of \$1,000 or less for the year. (Enter this info. once.) ▶ \$ \_\_\_\_\_  
Use duplicate copies of Part III if additional space is needed.

(a) No. from Part I	(b) Purpose of gift	(c) Use of gift	(d) Description of how gift is held
<b>(e) Transfer of gift</b>			
Transferee's name, address, and ZIP + 4		Relationship of transferor to transferee	
<b>(e) Transfer of gift</b>			
Transferee's name, address, and ZIP + 4		Relationship of transferor to transferee	
<b>(e) Transfer of gift</b>			
Transferee's name, address, and ZIP + 4		Relationship of transferor to transferee	
<b>(e) Transfer of gift</b>			
Transferee's name, address, and ZIP + 4		Relationship of transferor to transferee	
<b>(e) Transfer of gift</b>			
Transferee's name, address, and ZIP + 4		Relationship of transferor to transferee	

SCHEDULE D (Form 990)

Department of the Treasury Internal Revenue Service

Supplemental Financial Statements

Complete if the organization answered "Yes" on Form 990, Part IV, line 6, 7, 8, 9, 10, 11a, 11b, 11c, 11d, 11e, 11f, 12a, or 12b. Attach to Form 990.

Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No. 1545-0047

2019

Open to Public Inspection

Name of the organization THE AGRICULTURAL AND LABOR PROGRAM, INC. Employer identification number 59-1634148

Part I Organizations Maintaining Donor Advised Funds or Other Similar Funds or Accounts. Complete if the organization answered "Yes" on Form 990, Part IV, line 6.

Table with 3 columns: Question, (a) Donor advised funds, (b) Funds and other accounts. Rows include total number at end of year, aggregate value of contributions, grants, and end of year, and two Yes/No questions regarding donor property and grant fund usage.

Part II Conservation Easements. Complete if the organization answered "Yes" on Form 990, Part IV, line 7.

Form with multiple sections: 1. Purpose(s) of conservation easements (check all that apply); 2. Conservation contribution details (2a-2d); 3-8. Monitoring and enforcement details; 9. Reporting requirements.

Part III Organizations Maintaining Collections of Art, Historical Treasures, or Other Similar Assets. Complete if the organization answered "Yes" on Form 990, Part IV, line 8.

Form with sections 1a, 1b, and 2. 1a: Reporting requirements for public service. 1b: Reporting requirements for public service with amounts. 2: Reporting requirements for financial gain with amounts.

**Part III Organizations Maintaining Collections of Art, Historical Treasures, or Other Similar Assets** (continued)

- 3 Using the organization's acquisition, accession, and other records, check any of the following that make significant use of its collection items (check all that apply):
- a  Public exhibition
  - b  Scholarly research
  - c  Preservation for future generations
  - d  Loan or exchange program
  - e  Other \_\_\_\_\_
- 4 Provide a description of the organization's collections and explain how they further the organization's exempt purpose in Part XIII.
- 5 During the year, did the organization solicit or receive donations of art, historical treasures, or other similar assets to be sold to raise funds rather than to be maintained as part of the organization's collection?  Yes  No

**Part IV Escrow and Custodial Arrangements.** Complete if the organization answered "Yes" on Form 990, Part IV, line 9, or reported an amount on Form 990, Part X, line 21.

- 1a Is the organization an agent, trustee, custodian or other intermediary for contributions or other assets not included on Form 990, Part X?  Yes  No
- b If "Yes," explain the arrangement in Part XIII and complete the following table:
- |                                 | Amount |
|---------------------------------|--------|
| c Beginning balance             | 1c     |
| d Additions during the year     | 1d     |
| e Distributions during the year | 1e     |
| f Ending balance                | 1f     |
- 2a Did the organization include an amount on Form 990, Part X, line 21, for escrow or custodial account liability?  Yes  No
- b If "Yes," explain the arrangement in Part XIII. Check here if the explanation has been provided on Part XIII

**Part V Endowment Funds.** Complete if the organization answered "Yes" on Form 990, Part IV, line 10.

	(a) Current year	(b) Prior year	(c) Two years back	(d) Three years back	(e) Four years back
1a Beginning of year balance					
b Contributions					
c Net investment earnings, gains, and losses					
d Grants or scholarships					
e Other expenditures for facilities and programs					
f Administrative expenses					
g End of year balance					

- 2 Provide the estimated percentage of the current year end balance (line 1g, column (a)) held as:
- a Board designated or quasi-endowment \_\_\_\_\_%
  - b Permanent endowment \_\_\_\_\_%
  - c Term endowment \_\_\_\_\_%
- The percentages on lines 2a, 2b, and 2c should equal 100%.
- 3a Are there endowment funds not in the possession of the organization that are held and administered for the organization by:
- |   | Yes    | No |
|---|--------|----|
| (i) Unrelated organizations   | 3a(i)  |    |
| (ii) Related organizations  | 3a(ii) |    |
| b If "Yes" on line 3a(ii), are the related organizations listed as required on Schedule R? <input type="checkbox"/> | 3b     |    |
- 4 Describe in Part XIII the intended uses of the organization's endowment funds.

**Part VI Land, Buildings, and Equipment.**

Complete if the organization answered "Yes" on Form 990, Part IV, line 11a. See Form 990, Part X, line 10.

Description of property	(a) Cost or other basis (investment)	(b) Cost or other basis (other)	(c) Accumulated depreciation	(d) Book value
1a Land		545,000.		545,000.
b Buildings		2,453,390.	2,404,704.	48,686.
c Leasehold improvements		234,549.	217,183.	17,366.
d Equipment		1,764,965.	1,191,594.	573,371.
e Other		227,112.	225,780.	1,332.
<b>Total.</b> Add lines 1a through 1e. (Column (d) must equal Form 990, Part X, column (B), line 10c.)				1,185,755.

**Part VII Investments - Other Securities.**

Complete if the organization answered "Yes" on Form 990, Part IV, line 11b. See Form 990, Part X, line 12.

(a) Description of security or category (including name of security)	(b) Book value	(c) Method of valuation: Cost or end-of-year market value
(1) Financial derivatives .....		
(2) Closely held equity interests .....		
(3) Other .....		
(A)		
(B)		
(C)		
(D)		
(E)		
(F)		
(G)		
(H)		
<b>Total.</b> (Col. (b) must equal Form 990, Part X, col. (B) line 12.) ▶		

**Part VIII Investments - Program Related.**

Complete if the organization answered "Yes" on Form 990, Part IV, line 11c. See Form 990, Part X, line 13.

(a) Description of investment	(b) Book value	(c) Method of valuation: Cost or end-of-year market value
(1)		
(2)		
(3)		
(4)		
(5)		
(6)		
(7)		
(8)		
(9)		
<b>Total.</b> (Col. (b) must equal Form 990, Part X, col. (B) line 13.) ▶		

**Part IX Other Assets.**

Complete if the organization answered "Yes" on Form 990, Part IV, line 11d. See Form 990, Part X, line 15.

(a) Description	(b) Book value
(1)	
(2)	
(3)	
(4)	
(5)	
(6)	
(7)	
(8)	
(9)	
<b>Total.</b> (Column (b) must equal Form 990, Part X, col. (B) line 15.) ▶	

**Part X Other Liabilities.**

Complete if the organization answered "Yes" on Form 990, Part IV, line 11e or 11f. See Form 990, Part X, line 25.

1. (a) Description of liability	(b) Book value
(1) Federal income taxes	
(2) REFUNDABLE ADVANCES	982,752.
(3)	
(4)	
(5)	
(6)	
(7)	
(8)	
(9)	
<b>Total.</b> (Column (b) must equal Form 990, Part X, col. (B) line 25.) ▶	982,752.

2. Liability for uncertain tax positions. In Part XIII, provide the text of the footnote to the organization's financial statements that reports the organization's liability for uncertain tax positions under FASB ASC 740. Check here if the text of the footnote has been provided in Part XIII ...

**Part XI Reconciliation of Revenue per Audited Financial Statements With Revenue per Return.**

Complete if the organization answered "Yes" on Form 990, Part IV, line 12a.

<b>1</b>	Total revenue, gains, and other support per audited financial statements	<b>1</b>	16,009,505.
<b>2</b>	Amounts included on line 1 but not on Form 990, Part VIII, line 12:		
<b>a</b>	Net unrealized gains (losses) on investments	<b>2a</b>	
<b>b</b>	Donated services and use of facilities	<b>2b</b>	837,602.
<b>c</b>	Recoveries of prior year grants	<b>2c</b>	
<b>d</b>	Other (Describe in Part XIII.)	<b>2d</b>	2,576.
<b>e</b>	Add lines <b>2a</b> through <b>2d</b>	<b>2e</b>	840,178.
<b>3</b>	Subtract line <b>2e</b> from line <b>1</b>	<b>3</b>	15,169,327.
<b>4</b>	Amounts included on Form 990, Part VIII, line 12, but not on line 1:		
<b>a</b>	Investment expenses not included on Form 990, Part VIII, line 7b	<b>4a</b>	
<b>b</b>	Other (Describe in Part XIII.)	<b>4b</b>	
<b>c</b>	Add lines <b>4a</b> and <b>4b</b>	<b>4c</b>	0.
<b>5</b>	Total revenue. Add lines <b>3</b> and <b>4c</b> . (This must equal Form 990, Part I, line 12.)	<b>5</b>	15,169,327.

**Part XII Reconciliation of Expenses per Audited Financial Statements With Expenses per Return.**

Complete if the organization answered "Yes" on Form 990, Part IV, line 12a.

<b>1</b>	Total expenses and losses per audited financial statements	<b>1</b>	15,882,149.
<b>2</b>	Amounts included on line 1 but not on Form 990, Part IX, line 25:		
<b>a</b>	Donated services and use of facilities	<b>2a</b>	837,602.
<b>b</b>	Prior year adjustments	<b>2b</b>	
<b>c</b>	Other losses	<b>2c</b>	
<b>d</b>	Other (Describe in Part XIII.)	<b>2d</b>	2,576.
<b>e</b>	Add lines <b>2a</b> through <b>2d</b>	<b>2e</b>	840,178.
<b>3</b>	Subtract line <b>2e</b> from line <b>1</b>	<b>3</b>	15,041,971.
<b>4</b>	Amounts included on Form 990, Part IX, line 25, but not on line 1:		
<b>a</b>	Investment expenses not included on Form 990, Part VIII, line 7b	<b>4a</b>	
<b>b</b>	Other (Describe in Part XIII.)	<b>4b</b>	
<b>c</b>	Add lines <b>4a</b> and <b>4b</b>	<b>4c</b>	0.
<b>5</b>	Total expenses. Add lines <b>3</b> and <b>4c</b> . (This must equal Form 990, Part I, line 18.)	<b>5</b>	15,041,971.

**Part XIII Supplemental Information.**

Provide the descriptions required for Part II, lines 3, 5, and 9; Part III, lines 1a and 4; Part IV, lines 1b and 2b; Part V, line 4; Part X, line 2; Part XI, lines 2d and 4b; and Part XII, lines 2d and 4b. Also complete this part to provide any additional information.

PART X, LINE 2:

ALPI IS EXEMPT FROM FEDERAL INCOME TAXES UNDER SECTION 501(C)(3) OF THE INTERNAL REVENUE CODE AND FROM STATE INCOME TAXES UNDER SIMILAR PROVISIONS OF THE FLORIDA STATUTES. ACCORDINGLY, NO PROVISION FOR FEDERAL AND STATE INCOME TAXES HAS BEEN RECORDED IN THE ACCOMPANYING FINANCIAL STATEMENTS. IN ADDITION, MANAGEMENT ASSESSED WHETHER THERE WERE ANY UNCERTAIN TAX POSITIONS WHICH MAY GIVE RISE TO INCOME TAX LIABILITIES AND DETERMINED THAT THERE WERE NO SUCH MATTERS REQUIRING RECOGNITION IN THE ACCOMPANYING FINANCIAL STATEMENTS. ALPI FILES INCOME TAX RETURNS IN THE U.S. FEDERAL JURISDICTION. GENERALLY, ALPI IS NO LONGER SUBJECT TO U.S. FEDERAL INCOME TAX EXAMINATIONS BY TAX AUTHORITIES FOR YEARS BEFORE JUNE 30, 2017

**Part XIII** Supplemental Information *(continued)*

PART XI, LINE 2D - OTHER ADJUSTMENTS:

LOSS ON DISPOSAL OF FIXED ASSETS 2,576.

PART XII, LINE 2D - OTHER ADJUSTMENTS:

LOSS ON DISPOSAL OF FIXED ASSETS 2,576.



**Part II Fundraising Events.** Complete if the organization answered "Yes" on Form 990, Part IV, line 18, or reported more than \$15,000 of fundraising event contributions and gross income on Form 990-EZ, lines 1 and 6b. List events with gross receipts greater than \$5,000.

		(a) Event #1	(b) Event #2	(c) Other events	(d) Total events (add col. (a) through col. (c))
		ANNUAL MEETING FUNDRAISER (event type)	(event type)	NONE (total number)	
Revenue	1	Gross receipts	37,557.		37,557.
	2	Less: Contributions			
	3	Gross income (line 1 minus line 2)	37,557.		37,557.
Direct Expenses	4	Cash prizes			
	5	Noncash prizes			
	6	Rent/facility costs			
	7	Food and beverages			
	8	Entertainment			
	9	Other direct expenses			
	10	Direct expense summary. Add lines 4 through 9 in column (d)			
11	Net income summary. Subtract line 10 from line 3, column (d)				37,557.

**Part III Gaming.** Complete if the organization answered "Yes" on Form 990, Part IV, line 19, or reported more than \$15,000 on Form 990-EZ, line 6a.

		(a) Bingo	(b) Pull tabs/instant bingo/progressive bingo	(c) Other gaming	(d) Total gaming (add col. (a) through col. (c))
Revenue	1	Gross revenue			
	2	Cash prizes			
Direct Expenses	3	Noncash prizes			
	4	Rent/facility costs			
	5	Other direct expenses			
6	Volunteer labor	<input type="checkbox"/> Yes _____ % <input type="checkbox"/> No	<input type="checkbox"/> Yes _____ % <input type="checkbox"/> No	<input type="checkbox"/> Yes _____ % <input type="checkbox"/> No	
7	Direct expense summary. Add lines 2 through 5 in column (d)				
8	Net gaming income summary. Subtract line 7 from line 1, column (d)				

9 Enter the state(s) in which the organization conducts gaming activities: \_\_\_\_\_

a Is the organization licensed to conduct gaming activities in each of these states?  Yes  No

b If "No," explain: \_\_\_\_\_

10a Were any of the organization's gaming licenses revoked, suspended, or terminated during the tax year?  Yes  No

b If "Yes," explain: \_\_\_\_\_





**SCHEDULE I  
(Form 990)**

Department of the Treasury  
Internal Revenue Service

**Grants and Other Assistance to Organizations,  
Governments, and Individuals in the United States**  
Complete if the organization answered "Yes" on Form 990, Part IV, line 21 or 22.

▶ Attach to Form 990.

▶ Go to [www.irs.gov/Form990](http://www.irs.gov/Form990) for the latest information.

OMB No. 1545-0047

**2019**

Open to Public  
Inspection

Name of the organization **THE AGRICULTURAL AND LABOR PROGRAM, INC.** Employer identification number **59-1634148**

**Part I General Information on Grants and Assistance**

- 1** Does the organization maintain records to substantiate the amount of the grants or assistance, the grantees' eligibility for the grants or assistance, and the selection criteria used to award the grants or assistance?  Yes  No
- 2** Describe in Part IV the organization's procedures for monitoring the use of grant funds in the United States.

**Part II Grants and Other Assistance to Domestic Organizations and Domestic Governments.** Complete if the organization answered "Yes" on Form 990, Part IV, line 21, for any recipient that received more than \$5,000. Part II can be duplicated if additional space is needed.

1 (a) Name and address of organization or government	(b) EIN	(c) IRC section (if applicable)	(d) Amount of cash grant	(e) Amount of non-cash assistance	(f) Method of valuation (book, FMV, appraisal, other)	(g) Description of noncash assistance	(h) Purpose of grant or assistance
CENTER FOR INDEPENDENT LIVING IN CENTRAL FLORIDA - 720 NORTH DENNING DRIVE - WINTER PARK, FL 32789	59-1828770	501(C)(3)	10,000.	0.			CSBG
GOODWILL INDUSTRIES OF SOUTHWEST FLORIDA, INC - 5100 TICE STREET - FT. MYERS, FL 33905	59-6196141	501(C)(3)	11,790.	0.			LIHEAP/CSBG
JUMPSTART DEVELOPMENT CENTER 1068 PINE AVENUE LAKE WALES, FL 33853	80-0339886	501(C)(3)	149,495.	0.			EARLY HEAD START
LEARNING TREE ACADEMY, INC. 752 BENTCREEK DRIVE FT. PIERCE, FL 34947	65-0215212	501(C)(3)	73,202.	0.			HEAD START
BOYS & GIRLS CLUBS OF LAKELAND, INC - 950 PINWOOD AVE - LAKELAND, FL 33815	59-1361826	501(C)(3)	5,400.	0.			EARLY HEAD START
COALITION OF FLORIDA FARMWORKERS ORGANIZATIONS - 214 A SOUTH 1ST ST. - IMMOKOLEE, FL 34142	59-2149950	501(C)(3)	3,090.	0.			LIHEAP

- 2** Enter total number of section 501(c)(3) and government organizations listed in the line 1 table **13.**
- 3** Enter total number of other organizations listed in the line 1 table

LHA For Paperwork Reduction Act Notice, see the Instructions for Form 990.

Schedule I (Form 990) (2019)

Part II Continuation of Grants and Other Assistance to Governments and Organizations in the United States (Schedule I (Form 990), Part II.)							
(a) Name and address of organization or government	(b) EIN	(c) IRC section if applicable	(d) Amount of cash grant	(e) Amount of non-cash assistance	(f) Method of valuation (book, FMV, appraisal, other)	(g) Description of non-cash assistance	(h) Purpose of grant or assistance
IN THE IMAGE OF CHRIST 707 7TH ST. FT. PIERCE, FL 34950	65-1104332	501(C)(3)	29,910.	0.			LIHEAP
MACEDONIA BAPTIST CHURCH 1003 3RD AVE. N. NAPLES, FL 34102	32-0305467	501(C)(3)	3,630.	0.			LIHEAP
JESUS HOUSE OF HOPE, INC 2484 SE BONITA ST STUART, FL 34997	59-2422998	501(C)(3)	2,250.	0.			LIHEAP
MUSTARD SEED MINISTRIES 3130 S US HIGHWAY 11 FT PIERCE, FL 34982	65-0017366	501(C)(3)	7,440.	0.			LIHEAP
PORT SALERNO CHURCH OF GOD 4605 SE COVE RD STUART, FL 34997	47-4651487	501(C)(3)	4,500.	0.			LIHEAP
WOMEN'S RESOURCE CENTER 165 AVE A NW WINTER HAVEN, FL 33881	59-2344584	501(C)(3)	10,877.	0.			LIHEAP
BIG BROTHERS BIG SISTERS OF THE SUN COAST - 279 U.S. HGWY 27 - NORTH SEBRING, FL 33871	59-1361826	501(C)(3)	12,800.	0.			CSBG

**Part III** **Grants and Other Assistance to Domestic Individuals.** Complete if the organization answered "Yes" on Form 990, Part IV, line 22.  
Part III can be duplicated if additional space is needed.

(a) Type of grant or assistance	(b) Number of recipients	(c) Amount of cash grant	(d) Amount of non-cash assistance	(e) Method of valuation (book, FMV, appraisal, other)	(f) Description of noncash assistance
ASSISTANCE TO FARM WORKERS - EMERGENCY ASSISTANCE, RENTS, FOOD, UTILITIES, ASSESSMENT, LITERACY, HOUSING COUNSELING, ETC	16105	3,271,402.	0.		

**Part IV** **Supplemental Information.** Provide the information required in Part I, line 2; Part III, column (b); and any other additional information.

PART I, LINE 2:

ALL SUBGRANTS ARE ADMINISTERED THROUGH SUBGRANTEE CONTRACTS WHICH SPECIFY  
 THE REQUIREMENTS AND PROCEDURES FOR SERVICES, RECORD KEEPING, AND INVOICE  
 DOCUMENTATION FOR REIMBURSEMENT. NO PAYMENTS ARE MADE WITHOUT THE PROPER  
 DOCUMENTATION. ON-SITE REVIEWS ARE DONE BY THE ORGANIZATION'S PROGRAM  
 STAFF TO VERIFY COMPLIANCE.

**SCHEDULE O**  
**(Form 990 or 990-EZ)**

Department of the Treasury  
Internal Revenue Service

**Supplemental Information to Form 990 or 990-EZ**

Complete to provide information for responses to specific questions on  
Form 990 or 990-EZ or to provide any additional information.

▶ Attach to Form 990 or 990-EZ.

▶ Go to [www.irs.gov/Form990](http://www.irs.gov/Form990) for the latest information.

OMB No. 1545-0047

**2019**

Open to Public  
Inspection

Name of the organization

THE AGRICULTURAL AND LABOR PROGRAM, INC.

Employer identification number

59-1634148

FORM 990, PART VI, SECTION A, LINE 7A:

ALL BOARD MEMBERS ELIGIBLE TO VOTE SHALL BE IDENTIFIED BY ONE OF THREE

DESIGNATIONS. THESE ARE: (1) ELECTED PUBLIC OFFICIALS, (2) LOW-INCOME

COMMUNITY REPRESENTATIVES, AND (3) LOCAL BUSINESS/OTHER REPRESENTATIVES.

THE BOARD OF DIRECTORS SHALL HAVE THE AUTHORITY TO APPOINT ALL MEMBERS,

EXCEPT FOR THE LOW-INCOME COMMUNITY REPRESENTATIVES WHO SHALL BE ELECTED BY

THE REGIONAL ADVISORY COUNCIL(S), PROVIDED, HOWEVER, ONE MEMBER WILL BE A

REPRESENTATIVE OF THE HEAD START POLICY COUNCIL AND ONE MEMBER WILL BE A

REPRESENTATIVE OF ATEC. NO FEWER THAN ONE-THIRD OF ALL VOTING MEMBERS SHALL

BE COMPROMISED OF INDIVIDUALS REPRESENTING THE LOW-INCOME COMMUNITIES

WHEREIN THE AGRICULTURAL AND LABOR PROGRAM, INC. (ALPI) PROVIDES SERVICES.

REGIONAL ADVISORY COUNCIL: THE CORPORATION MEMBERSHIP SHALL BE DIVIDED INTO

FOUR REGIONS: SOUTHERN, EASTERN, CENTRAL, AND NORTHERN, WITH EACH REGION

HAVING A REGIONAL ADVISORY COUNCIL. THE REGIONS SHALL BE DESIGNATED BY THE

BOARD OF DIRECTORS. REGIONAL ADVISORY COUNCILS SHALL SERVE IN AN ADVISORY

CAPACITY TO THE BOARD OF DIRECTORS. THE REGIONAL ADVISORY COUNCIL SHALL

HAVE A MEMBERSHIP OF NOT LESS THAN SIX NOR MORE THAN EIGHTEEN. NO EMPLOYEE

OF THE AGENCY MAY SERVE ON ANY REGIONAL ADVISORY COUNCIL.

FORM 990, PART VI, SECTION A, LINE 8B:

THERE ARE NOT ANY COMMITTEES WITH THE AUTHORITY TO ACT ON BEHALF OF THE

GOVERNING BODY.

FORM 990, PART VI, SECTION B, LINE 11B:

THE CEO REVIEWS THE FORM 990 ON BEHALF OF THE BOARD BEFORE IT IS FILED.

THE COMPLETED FORM 990 IS THEN PRESENTED TO THE EXECUTIVE COMMITTEE FOR

LHA For Paperwork Reduction Act Notice, see the Instructions for Form 990 or 990-EZ.

Name of the organization THE AGRICULTURAL AND LABOR PROGRAM, INC.	Employer identification number 59-1634148
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REVIEW AND INFORMATION.

FORM 990, PART VI, SECTION B, LINE 12C:

IN ORDER TO ASSURE FAIR AND UNBIASED BUSINESS TRANSACTIONS, ALL BOARD MEMBERS COMPLY WITH THE "CODE OF BUSINESS CONDUCT" RELATED PARTY TRANSACTIONS ARE DISCLOSED, IN THE CEO'S REPORT, SUBMITTED TO THE GOVERNING BODY. IN ADDITION, A MEMBER WHO MAY HAVE A POTENTIAL CONFLICT, WILL RECUSE THEMSELVES, DURING BUDGET APPROVAL.

FORM 990, PART VI, SECTION B, LINE 15:

THE PROCESS FOR DETERMINING COMPENSATION INCLUDES THE USE OF A WAGE AND COMPARABILITY, AND EXECUTIVE LEVEL SALARY CAP STUDY . COMPENSATION RECOMMENDATIONS ARE PRESENTED TO INDEPENDENT MEMBERS OF THE BOARD FOR REVIEW AND APPROVAL. DELIBERATIONS AND DECISIONS ARE DOCUMENTED IN THE BOARD MINUTES, AND COMPENSATION CHANGES ARE IMPLEMENTED IN THE FOLLOWING FISCAL YEAR.

FORM 990, PART VI, SECTION C, LINE 19:

THE ORGANIZATION MAKES ITS GOVERNING DOCUMENTS AND FINANCIAL STATEMENTS AVAILABLE TO THE PUBLIC UPON REQUEST FOR THE SAME PERIOD OF DISCLOSURE AS SET FORTH IN SECTION 6104(D).

FORM 990, PART XII, LINE 2C:

THE ORGANIZATION DID NOT CHANGE ITS PROCESSES DURING THE TAX YEAR.



# Funding Sources

- Head Start/ Early Head Start (ARP, CRSSA) (St. Lucie, Martin, Polk Counties)
- ALPI Child Care Centers (St. Lucie/Polk/Martin Counties)
- Early Learning Coalition (Polk and St. Lucie)
- USDA Food
- Children's Services Council
- Department of Economic Opportunity (LIHEAP, CSBG, ARP )
- Senior Connection Center, Inc. (ARP) (EHEAP)
- Emergency Solutions Grant (ESG)
- Permanent Supportive Housing (PSH)
- Department of Education (DOE)
- Florida Non-Profit Housing
- H.U.D. Housing Counseling
- FL Housing Finance Corporation
- ATEC
- Emergency Rental Assistance Program (ERAP)
- United Way Cares

**The Agricultural and Labor Program, Inc.**  
**Fiscal Year 2021-2022**  
**Agency Budget**

<b>REVENUES</b>	<b>FY 22</b>	<b>FY 21</b>
Head Start / Early Head Start (St. Lucie/Polk Counties)	9,818,560	9,816,095
Head Start COVID 19	506,311	688,497
Early Head Start COVID 19	-	2,836,208
HS EHS Amercian Rescue Plan	1,418,104	54,148
ALPI Child Care Centers (St. Lucie/Polk Counties)	82,755	82,755
ALPI CC Polk CARES	-	12,900
Polk ELC VPK	-	24,538
St Lucie County Early Learning VPK	703,985	681,912
USDA Food	967,460	967,460
Children's Services Council	110,964	114,870
Department of Economic Opportunity LIHEAP	6,227,080	6,227,080
Department of Economic Opportunity LIHEAP COVID 19	4,074,391	4,074,391
Department of Economic Opportunity LIHEAP ARP	2,860,108	
Senior Connection Center, Inc. EHEAP	159,943	162,490
Department of Economic Opportunity CSBG	1,010,160	977,084
Department of Economic Opportunity CSBG COVID 19	1,368,681	1,368,681
Polk Co Emergency Rental Assistance (ERAP)	3,300,000	
FPUA COVID 19	-	50,000
United Way COVID 19	-	463,449
Emergency Solutions Grant	64,303	53,265
Permanent Supportive Housing (PSH)	36,409	36,409
Department of Education EA	50,000	50,000
Florida Non Profit Housing	31,350	31,350
FACA\ Western Union	32,511	32,511
H.U.D. Housing Couseling	17,908	15,256
FL Housing Finance Corporation	-	0
ATEC	12,250	10,100
FACA/OAG	-	0
E-rate	27,950	27,950
Client Fees	-	0
Fund Raiser	35,000	35,000
Other	1,145	1,145
In-Kind / Cash Match	-	0
<b>TOTAL REVENUE</b>	<b>32,917,328</b>	<b>28,895,544</b>
<b>EXPENSES</b>		
Salaries and Wages	8,835,995	8,709,274
Fringe Benefits	2,370,806	2,334,922
Communications	442,765	386,965
Travel	236,588	215,514
Food	545,800	545,800
Rent and Utilities	1,412,612	1,240,447
Contractual Services	543,494	504,494
Materials and Supplies	2,484,734	3,731,291
Training	230,008	219,155
Grants, Subsidies and Contributions	14,482,649	9,704,420
Subcontractors	1,197,837	1,185,237
In-Kind	-	0
Other	134,040	118,025
<b>TOTAL EXPENSES</b>	<b>32,917,328</b>	<b>28,895,544</b>

## FINANCIAL INSTITUTIONS

### Bank of America

Operating Account

Interest Bearing Account

Interest Bearing Account - Grant Advances

### Sun Trust

Federal Funds Draw Down

Account Investment Account

Sunshine Account

### Wachovia

George W. Truitt Child Care Fee Account

Checking Account

Interest Bearing Account

### Citizens Bank & Trust

Frostproof Child Care Fee Account

# OUR PROGRAMS

Program service delivery activities are provided through the following programs:

- CSBG Family Self Sufficiency & Emergency Services (Counties Served: Glades, Hendry, Highlands and Polk)
- Farmworker Emergency Services (Counties Served: Statewide)
- LIHEAP Services (Counties Served: Collier, Glades, Hendry, Highlands, Martin, Polk and St. Lucie)
- Housing Counseling Services (Counties Served: Polk)
- ALPI Technical Education Center (Counties Served: Volusia)
- EHEAP Services (Counties Served: Polk)
- Head Start Services (Counties Served: St. Lucie and Martin)
- Early Head Start Services (Counties Served: Polk, St. Lucie and Martin)
- School Readiness VPK & Subsidized Child Care (Counties Served: Polk and St. Lucie)
- Child Care Food (Counties Served: Polk and St. Lucie)
- Computer Assisted Tutorial Program (CAT) & After School Care (Counties Served: St. Lucie)
- And more

ALPI's programs and services are funded in part by:



United Way of Central Florida & United Way of St. Lucie County

# CONTACT INFORMATION

## CORPORATE OFFICE

P.O. Box 3126  
 Winter Haven, Florida 33885  
 (863) 956-3491  
 (863) 956-3357 Fax  
 Admin@ALPI.org

## Executive Office

Arlene Dobison  
 Chief Executive Officer  
 Extension 204  
 Admin@ALPI.org

Maria Crespo  
 Executive Office Administrator  
 Extension 206  
 MCrespo@ALPI.org

## ADMINISTRATION

Budget and Finance  
 Dennis Gniewek, Director  
 Extension 210  
 DGniewek@ALPI.org

Human Resources  
 Yolanda Garrett, Director  
 Extension 202  
 YGarrett@ALPI.org

## COMMUNITY SERVICES AND ECONOMIC DEVELOPMENT DIVISION

Albert Miller, Division Director  
 Extension 212  
 AMiller@ALPI.org

LIHEAP/Community Services  
 Cheryl Burnham, Senior Manager  
 Extension 224  
 CBurnham@ALPI.org

CSBG/Economic Development  
 PaHoua Lee-Yang, Senior Manager  
 Extension 218  
 PYang@ALPI.org

## CHILD DEVELOPMENT & FAMILY SERVICES DIVISION

Eastern Region  
 Administration Office  
 2202 Avenue Q  
 Ft. Pierce, Florida 34950  
 (772) 466-2631  
 (772) 464-3035 Fax

Vacant, Division Director  
 772-466-2631, Extension 15  
 863-956-3491, Extension 215

Head Start/Early Head Start  
 Program Operations  
 (St. Lucie, Martin, & Polk Counties)

Myrna Rodriguez  
 Program Operations Director  
 (772) 466-2631, Extension 11  
 (863) 956-3491, Extension 215  
 MRodriguez@ALPI.org

Crystal Dames, Senior Manager  
 (772) 466-2631, Extension 14  
 CDames@ALPI.org

Head Start/Early Head Start  
 Program Operations  
 (Polk & St. Lucie Counties)  
 Maria Guerrero, Senior Manager  
 (863) 635-3396, Extension 40  
 MGuerrero@ALPI.org



P.O. Box 3126 | Winter Haven, FL 33881  
 Phone: 863.956.3491 | Fax: 863.956.3357  
 Email: admin@alpi.org | www.alpi.org

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 Providing a constant flow of Children and Family Services since 1968 ...

## FROM THE CEO



Arlene Dobison, CCAP, NCRI, HDFP

Serving as the CEO of this great agency is both an honor and a privilege. Although we have seen accomplishments in program expansion, community partnerships, client satisfaction, program recognition and professional accreditation, we also have seen an immense increase in the need for services and support.

Therefore, in an effort to be there for those in need, the ALPI organization, under my leadership, will continue to place a high priority on local partnerships and collaboration efforts to maximize the use of limited resources.

As we continue our journey into the future, I pledge to do "whatever it takes" to maintain a continuous flow of affordable, accessible, and quality services and programs to help as many families as possible to become self-sufficient.

My "Thanks" to the Coca-Cola Minute Maid Company and all the pioneers who conceived and championed the Agricultural and Labor Program vision more than 50 years ago.

## OUR HISTORY

The Agricultural and Labor Program, Inc. (ALPI), headquartered in Lake Alfred, FL, is an IRS certified 501(c)(3) private, nonprofit organization. The Agricultural and Labor Program is a direct descendent of The Agricultural and Labor Project, established in 1968 by the Coca-Cola Company to improve the quality of life for farm workers in their Florida citrus operations. Today, ALPI serves the total spectrum of socially and economically disadvantaged children and families throughout Florida.

In the early 70's, the organization made available child care services to the children of migrant and seasonal workers when no other service providers were available to meet the child care needs of these families. Since the late 70's, ALPI has continued to operate as the Central Agency for Subsidized Child Care Services that provides child care for thousands of children.

Over the years, a vast network has been established by ALPI. This network is comprised of agencies, churches, organizations and private groups and/or individuals. Partnerships and collaborative efforts between ALPI and the communities we serve are crucial to the success of service delivery.

In the years since its inception, The Agricultural and Labor Program, Inc. has continued to grow and to expand efforts to assist those persons that the organization was chartered to serve. This effort is continuous and will exist as long as there are persons needing services.



ALPI's first intake center - 1968. St. Lucie County, FL

## OUR MISSION

To collaborate with community partners and deliver human service programs that empower the economically disadvantaged and others to be self-sufficient.

### Five Underlying Principles

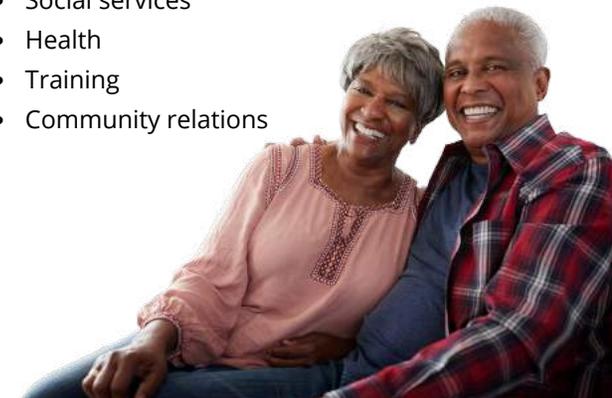
The Agricultural and Labor Project continues to be based on five underlying principles that have guided all its activities to date:

- Involvement of People
- Emphasis on long term accomplishments rather than promises
- Assurances of economic viability
- Emphasis on self-help
- A sound, integrated, total systems approach

### Areas Being Addressed

Through a vast number of resources, ALPI continues to address the critical areas of:

- Jobs and income
- Housing
- Education
- Social services
- Health
- Training
- Community relations



# CSBG Family Self-Sufficiency Program

## We Offer

- Financial support for students in school, such as money for books, uniforms, testing fees and sometimes tuition.
- Financial support for clients who have multiple barriers that prevent them from completing their education or maintaining their employment. Examples: food cards, rent, utilities, minor car repairs, daycare and other services on a case by case basis.
- Job skills workshops (resume and cover letter writing, how to fill out an application and mock interviews). Instruction on effective job seeking skills.
- Job development, placement and retention.
- One-on-one case management services to help guide students/clients back into school and/or re-entering the workforce.
- A free budget and money management class.



### Eligibility Criteria

Anyone with household income below 200% of the federal poverty guideline, over the age of 18, and is a Polk, Hendry or Highlands County resident.

Family Size	Max Annual Income	Max Monthly Income
1	\$25,520	\$2,127
2	\$34,480	\$2,873
3	\$43,440	\$3,620
4	\$52,400	\$4,367
5	\$61,360	\$5,113
6	\$70,320	\$5,860
7	\$79,280	\$6,607
8	\$88,240	\$7,353
9	\$97,200	\$8,100
10	\$106,160	\$8,847

If you are interested in this program, please fill out the information below.

Name: \_\_\_\_\_ Age: \_\_\_\_\_

Home phone: \_\_\_\_\_ Cell phone: \_\_\_\_\_

Email address: \_\_\_\_\_

Highest Grade Completed: \_\_\_\_\_ Did you graduate high school? Yes No

Interested in a GED or Vocational Training? Yes No

Are you seeking employment assistance? Yes No

Are you related to any ALPI employee? Yes No

## CONTACT INFORMATION

### Polk County

**Marlene Beauville**  
 300 Lynchburg Road  
 Lake Alfred, FL 33850  
 Appt. Phone: 863-247-3001\*  
 Fax: 863-956-3357  
 mbeauville@alpi.org

### Highlands County

**Toni Jones**  
 1306 S. Tulane Avenue  
 Avon Park, FL 33825  
 Appt. Phone: 863-247-3001\*  
 Phone: 863-657-0503  
 tjones@alpi.org

### Hendry County

**Patricia Astorga**  
 198 Six Street  
 Moore Haven, FL 33741  
 Phone: 863-946-0298  
 Fax: 863-946-0298  
 pastorga@alpi.org

\*24/7 phone line for scheduling client appointments for services.



Helping People. Changing Lives.



Our mission is "to collaborate with community partners and deliver human service programs that empower the economically disadvantaged and others to be self-sufficient".



**Call Today!  
Work slots  
are limited.**

# Community Partnership

The Agricultural and Labor Program, Inc. is a non-profit Community Action Agency that provides multiple services for low-income children and families in our community.

Participants that come to our agency are low-income with limited work experiences and education. ALPI's goal is to help program participants achieve a basic level of self-sufficiency. They are individually assisted through the program and encouraged to take steps toward personal success. This includes: earning a GED or Associate Degree, acquiring certifications in specific areas of interest, and helping to insure re-entry into today's workforce in order to earn a minimum livable wage for family support.

We will be offering a 14 Week Full-Time Work Experience Program for our participants, during which they will gain the skills and knowledge to re-start their work history and brush up on employment skills.

## All The Following Services Are Provided by ALPI

**Applicant Wages**

**Hiring Process**

**Workers Compensation Insurance**

**Job Retention**

**Close Communication With Employers**

**Continuous Support for  
Applicants and Employers**

**ALL employers have to do to partner with ALPI is simply provide positions for participants ... ALPI will do the rest! ALPI will provide weekly communication with employers to assure the best quality services. This is a win/win situation that benefits everyone involved, including our local community.**

*Call Now!*

**863.875.5585**

Fred Stickney - [fstickney@alpi.org](mailto:fstickney@alpi.org)

PaHoua Lee-Yang, Senior Manager  
863-956-3491 - ext. 218 · [pyang@alpi.org](mailto:pyang@alpi.org)

Arlene Dobison, CEO, CCAP, NCRI

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300 Lynchburg Road • Lake Alfred, FL 33850 • [www.alpi.org](http://www.alpi.org)

Helping People. Changing Lives.

The Agricultural and  
Labor Program, Inc.



community  
**Action**  
PARTNERSHIP  
America's Poverty Fighting Network

## EMERGENCY ASSISTANCE SEASONAL AND MIGRANT FARMWORKERS

ASSISTANCE WITH  
LIGHT, WATER, RENT, FOOD & GAS

# ALPI FARMWORKER PROGRAM

### DOCUMENTS REQUIRED FOR ASSISTANCE

- PHOTOCOPY OF CITIZENSHIP, RESIDENCY, WORK PERMIT or DRIVERS LICENSE (work documents - cannot be expired)
- PHOTOCOPY OF SOCIAL SECURITY CARDS FOR ALL HOUSEHOLD MEMBERS INCLUDING YOURSELF.
- PHOTOCOPY OF BIRTH CERTIFICATE FOR ALL HOUSEHOLD MEMBERS
- PHOTOCOPY OF INCOME (W2 form and last pay stub)
- PHOTOCOPY OF FOOD STAMPS BENEFIT LETTER (if applicable)

### CONTACT

Cheryl Burnham, Senior Manager  
LIHEAP/Community Services  
300 Lynchburg Road  
Lake Alfred, FL 33850  
863-956-3491, Ext. 224

[cburnham@alpi.org](mailto:cburnham@alpi.org)





*Commemorating*  
50 Years of Community Action! 1964-2014

*Providing*  
a constant flow of children & family support services since 1968.

The Agricultural and Labor Program, Inc. serves the total spectrum of socially and economically disadvantaged children and families in targeted counties in the state of Florida. Program service delivery activities are provided through the following programs:

- Head Start & Early Head Start
- Before and After School Care
- VPK School Readiness
- Low Income Home Energy Assistance (LIHEAP)
- Emergency Home Energy Assistance for the Elderly (EHEAP)
- Emergency Assistance for Farmworkers
- HUD Housing Counseling & Farmworker Rental Housing
- CSBG Family Self-Sufficiency
- USDA Child Care Food Service
- Technical Education Training Center
- Child Care
- And more

The Agricultural and Labor Program, Inc.'s focus is to provide a mechanism toward achieving and maintaining family stability and economic self-sufficiency.

300 Lynchburg Road • Lake Alfred, FL 33850 • (863) 956-3491 • Fax: (863) 956-3357 • [www.ALPI.org](http://www.ALPI.org)

For eligibility & center location information contact:  
ALPI Child Development and Family Services  
(863) 956-3491 | Fax: (863) 956-3357



Arlene Dobison, Chief Executive Officer  
William Holt, ALPI Board Chairperson





# The Agricultural and Labor Program, Inc.

## Low Income Home Energy Assistance Program (LIHEAP)

## Need Help Paying Your Utility Bill?

# LIHEAP

Electric bill payment assistance is available for *eligible residents* of the following counties:  
**Collier, Glades, Hendry, Highlands, Martin, Polk and St. Lucie**

The Low-Income Home Energy Assistance Program (LIHEAP) is a federally-funded program that provides energy assistance payments to low-income households. LIHEAP assistance supports ALPI's vision of individuals living safe, healthy and self-reliant lives.

### WHO IS ELIGIBLE?

Households must meet the following requirements:

1. Have a total household gross income of no more than 150% of the Federal Poverty guidelines.
2. Be responsible for paying their home heating or cooling bills.
3. Be a resident of any one of the following counties: Collier, Glades, Hendry, Highlands, Martin, Polk or St. Lucie.
4. Be a U.S. Citizen, qualified alien or permanent resident of the U.S.

*Additional requirements may be necessary for eligibility determination. You will be informed of these*

### HOW TO APPLY

Applications are accepted by calling the locations listed below and by appointment only. When applying for assistance, you must bring:

1. Photo ID (not expired) for all household members over 18 years of age
2. Social Security Cards for all household members
3. Proof of Income for the past 30 days for all household members (*no bank statements*)
4. Complete Light Bill (*no Final Notice*)
5. Food Stamp Approval Letter (*if receiving assistance*)
6. Section 8 or HUD Housing Rental Form 50059 (*if applicable to you*)

### INCOME GUIDELINES

#### 150% of Federal Poverty Guidelines

To be eligible, households must have a total gross income of no more than:

HOUSEHOLD SIZE	ANNUAL INCOME	MONTHLY INCOME
1 person	\$19,140	\$1,595
2 people	\$25,860	\$2,155
3 people	\$32,580	\$2,715
4 people	\$39,300	\$3,275
5 people	\$46,020	\$3,835
6 people	\$52,740	\$4,395
7 people	\$59,460	\$4,955

<sup>1</sup>You must **make your own copies** of your documents and bring them with you to your appointment. (*no originals*)  
<sup>2</sup>All Photocopies will remain with your application. <sup>3</sup>First come, first served eligibility requirements apply.

TO SCHEDULE AN APPOINTMENT, CALL:

# 863-247-3001

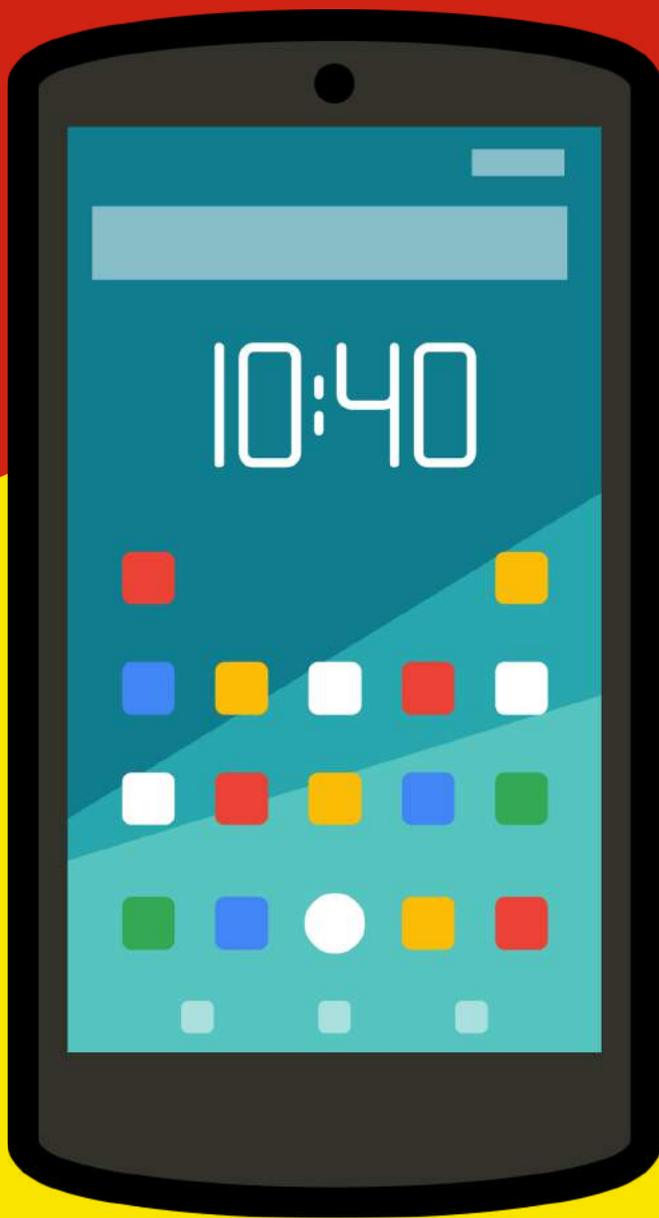
ALPI'S 24/7 toll-free appointment hotline

# APPOINTMENT SCHEDULING

Helping People. Changing Lives.



# 863-247-3001



Anyone requesting assistance can call ALPI's 24/7 hotline, to schedule an appointment.

Requests for assistance may also be made via our easy, online application, available at [www.alpi.org](http://www.alpi.org).

*Certain restrictions apply and specific documentation is required.*



**Masks are required at all ALPI locations.**



# ALPI Technical Education Center

## *Certified Nursing Assistant Prep Class*

**DO YOU WANT A REAL CAREER?**  
**THIS IS YOUR CHANCE!**

**Start your new career journey today!**  
**Classes filling up fast, so call now.**



# Call Today!

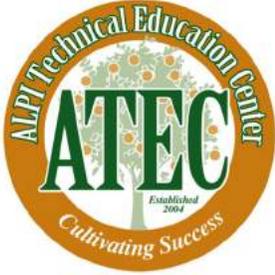
## 386.624.6912

Applicants must: 1. Be at least 18 years of age at time of application or graduation. 2. Be able to communicate in the English language. 3. Be able to pass a criminal background screening. 4. Have a high school diploma, GED or score of nine on TABE test.

Lisa Brinkerhoff, Admission/Client Services Specialist I

PaHoua Lee-Yang, Administrator  
ALPI Technical Education Center  
1324 East International Speedway Blvd., Suite C-5  
Deland, FL 32724





# ALPI Technical Education Center

## Home Health Aide Program

Licensed by the Commission for Independent Education (License Number 3269)

# DO YOU WANT A REAL CAREER?

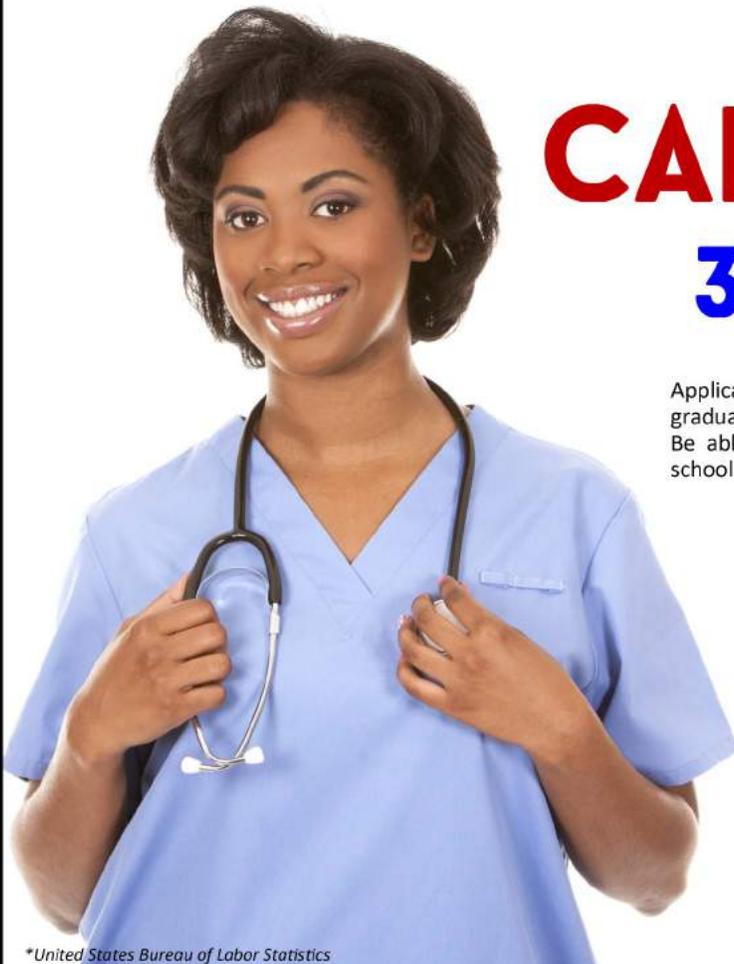
# THIS IS YOUR CHANCE!

### Home Health Aide Program

- ✓ Home health care is one of the most rapidly growing areas of the healthcare industry.\*
- ✓ Tremendous growth is predicted thru 2018 and beyond.\*

**Start your new career journey today!**

**Classes filling up fast, so call now.**



# CALL TODAY!

# 386.624.6912

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\*United States Bureau of Labor Statistics

**BOARD OF DIRECTORS  
 2022 TASKS AND TIMELINES**

TASK(S)	ACTION ITEM	TRAINING	SPECIAL EVENT	Committee(s)/ Person Assigned
<b>FEBRUARY</b>				
Shared Governance Orientation		X		CEO, Bd Chair
Establish Board Meeting Schedule	X			CEO, Bd Chair
Establish Board Committee Assignments	X			CEO, Bd Chair
Establish Board/Policy Council Tasks & Timelines	X			CEO, Bd Chair
Review Head Start Policy Council Meeting Schedule	X			CEO, Bd Chair
Review and Approve Board Meeting Action Items	X			Full Board
Confirm elections and review Advisory Council Meeting Schedules	X			CEO, Bd Chair
Review Fundraising State Certification	X			CEO, Bd Chair
Identify Potential Speakers for Annual Corporate Luncheon			X	CEO
<b>MARCH</b>				
Review Head Start Self-Assessment Report	X			CEO, Bd Chair, PP
Review Financial Reports	X			CEO, Bd Chair, B/F
Review Y-T-D Grant Reports <ul style="list-style-type: none"> <li>• Performance</li> <li>• Reimbursement</li> </ul>	X			CEO, Bd Chair, PP
Approve proposed grant applications	X			CEO, Bd Chair, PP
Annual Regional Councils' Orientation and Timelines (per region)		X		CEO, Bd Chair, ACR
Effective Advisory Council Meetings (i.e. Robert Rules of Order, etc)		X		CEO, Bd Chair, ACR
Regional Advisory Council Agenda Items and Community Needs	X			CEO, Bd Chair, ACR
Representation for Upcoming Conferences/Meetings/Events	X	X	X	TBA
<b>April</b>				
Board Meeting/ALPI Site Visit <ul style="list-style-type: none"> <li>• Frostproof Child Development Center and Lakeview Park</li> </ul>	X			CEO, Bd Chair
Discuss 2022 Preliminary Operating Budget	X			CEO, Bd Chair, B/F
Establish Annual Picnic Plan/Budget	X			CEO, Bd Chair, SE
Review Board Recognition/Appreciation Awards Plan * Identify CEO Annual Award for 2022	X			CEO, Bd Chair, SE
Review Head Start/EHS 2021-2022 Program Goals and Objectives	X			CEO, PP
Review community target areas to be served by ALPI Head Start/EHS in 2021-2022	X			CEO, PP
Review ALPI Head Start/EHS 2021-2022 Community Resource Plan	X			CEO, PP
Review programs' quarterly monitoring reports	X			CEO, PP
Review Advisory Council Membership Recruitment Plan	X			CEO, BL/MS
Review Head Start/EHS Policy Council Membership Recruitment and Organization Plan	X			CEO, BL/MS
				Page 764 of 803

**BOARD OF DIRECTORS  
 2022 TASKS AND TIMELINES**

TASK(S)	ACTION ITEM	TRAINING	SPECIAL EVENT	Committee(s)/ Person Assigned
<b>APRIL CONTINUED</b>				
Review Head Start/EHS 2021-2022 Self-Assessment Results and QIP	X			CEO, PP
Review ALPI Head Start/EHS 2021-2022 criteria for recruitment, selection and enrollment priorities	X			CEO, PP
Review Agency 2021-2022 Legislative Agenda/Plan	X			CEO, GA
Keynote Speaker Criteria <ul style="list-style-type: none"> <li>• Finalize Keynote Speaker for Annual Corporate Luncheon</li> <li>• Send out Contract for Keynote Speaker</li> </ul>	X		X	CEO, Bd Chair, SE
Review Financial Reports	X			CEO, Bd Chair, B/F
Review Y-T-D Grant Reports <ul style="list-style-type: none"> <li>• Performance</li> <li>• Reimbursement</li> <li>• In-kind Match</li> </ul>	X			CEO, Bd Chair, PP
Review Board Fundraising Report	X			CEO, Bd Chair, B/F
Approve proposed grant applications	X			CEO, Bd Chair, PP
Representation for Upcoming Conferences/Meetings/Events	X	X	X	TBA
<b>MAY</b>				
Finalize Annual Picnic Plan/Budget <ul style="list-style-type: none"> <li>• Send out RFP for Food Vendors</li> </ul>	X			CEO, Bd Chair, SE
Board Site Visit <ul style="list-style-type: none"> <li>• St. Lucie County</li> </ul>			X	CEO, Board of Directors
Review Financial Reports	X			CEO, Bd Chair, B/F
Review Y-T-D Grants Reports <ul style="list-style-type: none"> <li>• Performance</li> <li>• Reimbursement</li> <li>• In-Kind Match</li> </ul>	X			CEO, Bd Chair, PP
Approve proposed grant applications	X			CEO, Bd Chair, PP
Representation for Upcoming Conferences/Meetings/Events	X	X	X	TBA
<b>JUNE</b>				
Board Meeting	X			CEO, Bd Chair
Approve Employee Health Insurance Proposal <ul style="list-style-type: none"> <li>• Benefit Enrollment Start Date Change</li> </ul>	X			CEO, Bd Chair, EC
Conduct Annual Picnic Activities	X		X	CEO, Bd Chair, SE
Review Annual Board Management Retreat Plans	X			CEO, Bd Chair

**BOARD OF DIRECTORS  
 2022 TASKS AND TIMELINES**

TASK(S)	ACTION ITEM	TRAINING	SPECIAL EVENT	Committee(s)/ Person Assigned
Review and Finalize Annual Meeting Program Procedures <ul style="list-style-type: none"> <li>Annual Business Meeting and Corporate Luncheon Theme</li> <li>Review Community Services Award Criteria</li> <li>Review Annual Meeting Draft, E-Mail List</li> <li>Annual Meeting Program Agenda Content and Program Participants</li> </ul>	X		X	CEO, Bd Chair, SE
Succession Plan Short and Long Term	X			CEO, Bd Chair, SP
Identify nominee(s) for Volunteer Services Awards (ALPI, Robert Bryant, Jr., FACA, FHSA, SEACAA, Region IV HS, NHSA)	X			CEO, SE
Review Financial Reports	X			CEO, Bd Chair, B/F
Review Y-T-D Grant Reports <ul style="list-style-type: none"> <li>Performance</li> <li>Reimbursement</li> <li>In-Kind Match</li> </ul>	X			CEO, Bd Chair, PP
Review Board Fundraising Report	X			CEO, Bd Chair, B/F
Review CEO Performance Evaluation Procedures & Instrument for 2021	X			CEO, Bd Chair
Approve proposed grant applications	X			CEO, Bd Chair, PP
Regional Advisory Council Agenda Items and Community Needs	X			CEO, Bd Chair, ACR
Five Year Strategic Plan 2020-2024 Review	X			CEO, BD, PP
Representation for Upcoming Conferences/Meetings/Events	X	X	X	TBA
<b>JULY</b>				
Review Agency Retirement Plan	X			CEO, Bd Chair, EC
Review Financial Reports	X			CEO, Bd Chair, B/F
Annual Meeting Order of Trinkets (Board and Staff)	X			CEO, IT and SE Liaison
Review Y-T-D Grant Reports <ul style="list-style-type: none"> <li>Performance</li> <li>Reimbursement</li> <li>In-kind Match</li> </ul>	X			CEO, Bd Chair, PP
Approve proposed grant applications	X			CEO, Bd Chair, PP
Representation for Upcoming Conferences/Meetings/Events	X	X	X	TBA
<b>AUGUST</b>				
Review Tripartite Board Membership & Meeting Attendance	X			CEO, Bd Chair, BL/MS
Review Financial Reports	X			CEO, Bd Chair, B/F
Review Y-T-D Grant Reports <ul style="list-style-type: none"> <li>Performance</li> <li>Reimbursement</li> <li>In-kind Match</li> </ul>	X			CEO, Bd Chair, PP

**BOARD OF DIRECTORS  
 2022 TASKS AND TIMELINES**

TASK(S)	ACTION ITEM	TRAINING	SPECIAL EVENT	Committee(s)/ Person Assigned
<b>AUGUST</b>				
Approve proposed grant applications	X			CEO, Bd Chair, PP
Representation for Upcoming Conferences/Meetings/Events	X	X	X	TBA
<b>SEPTEMBER</b>				
Board Meeting	X			CEO, Bd Chair
Review Risk Management Assessment Checklist	X			CEO, PP
Identify Board Nominees for 2022 Recognition/Appreciation Awards	X			CEO, Bd Chair, SE
Annual Meeting Notices <ul style="list-style-type: none"> <li>• Corporate Sponsorship Solicitation</li> <li>• Greetings and Proclamation Solicitation</li> <li>• Finalize Contract Negotiations (Speakers, Venue)</li> </ul>	X		X	CEO, Bd Chair, SE
Review Board Membership Recruitment Plan	X			CEO, Bd Chair, BL/MS
Review programs' quarterly monitoring reports	X			CEO, PP
Review Head Start/EHS Policy Council Election procedures/results	X			CEO, Bd Chair, BL/MS
Elect Board Member to serve on the 2021-2022 Policy Council (identify future members)	X			CEO, EC
Approve Head Start/EHS Policy Council 2021-2022 Community Representatives	X			CEO, EC
Certify Corporate Membership Roster for Advisory Council Annual Election	X			CEO, Bd Chair, BL/MS
Review Financial Reports	X			CEO, Bd Chair, B/F
Review Board Fundraising Report	X			CEO, Bd Chair, B/F
Review Y-T-D Grant Reports <ul style="list-style-type: none"> <li>• Performance</li> <li>• Reimbursement</li> <li>• Inkind Match</li> </ul>	X			CEO, Bd Chair, PP
Approve proposed grant applications	X			CEO, Bd Chair, PP
Representation for Upcoming Conferences/Meetings/Events	X	X	X	TBA
<b>OCTOBER</b>				
Review Community Assessment Report	X			CEO, Bd Chair, PP
2022 Annual Business Meeting and Corporate Luncheon <ul style="list-style-type: none"> <li>• Go Live Website</li> <li>• E-mail Event Invitations</li> </ul>	X		X	CEO, Board Chair, SE
Review Financial Reports	X			CEO, Bd Chair, B/F

**BOARD OF DIRECTORS  
 2022 TASKS AND TIMELINES**

TASK(S)	ACTION ITEM	TRAINING	SPECIAL EVENT	Committee(s)/ Person Assigned
<b>OCTOBER</b>				
Review Y-T-D Grant Reports <ul style="list-style-type: none"> <li>• Performance</li> <li>• Reimbursement</li> <li>• In-Kind Match</li> </ul>	X			CEO, Bd Chair, PP
Approve proposed grant applications	X			CEO, Bd Chair, PP
Representation for Upcoming Conferences/Meetings/Events	X	X	X	TBA
Robert Bryant Jr. Award , mailing to Board Members for review, nomination selection and return to CEO, Sealed Envelope.			X	CEO, Bd Chair
<b>NOVEMBER</b>				
Board Meeting	X			CEO, Bd Chair
Annual Board Management Retreat	X	X		CEO, Bd Chair,
Review/Approve Annual Audit	X			CEO, Bd Chair, B/F
Review Annual Form 990 Preliminary Report	X			CEO, Bd Chair, B/F
2022 Annual Business Meeting and Corporate Luncheon Program <ul style="list-style-type: none"> <li>• Finalize Awards of Recipients on Program</li> </ul>	X		X	CEO, Bd Chair
Confirm Regional Advisory Councils Election Report	X			CEO, Bd Chair, BL/MS
Confirm Head Start Policy Council Election Report	X			CEO, Bd Chair, BL/MS
Review Strategic Plan	X			CEO, Bd Chair, PP
Certify Advisory Council Annual Election Procedures/Results	X			CEO, BL, MS
Review ALPI Head Start/EHS 2022 Self-Assessment Procedures	X			CEO, PP
Review Community Assessment Update Procedures	X			CEO, PP
Review Financial Reports	X			CEO, Bd Chair, B/F
Review Y-T-D Grant Reports <ul style="list-style-type: none"> <li>• Performance</li> <li>• Reimbursement</li> <li>• In-Kind Match</li> </ul>	X			CEO, Bd Chair, PP
Review Board Fundraising Report	X			CEO, Bd Chair, B/F
Approve proposed grant applications	X			CEO, Bd Chair, PP
<b>DECEMBER</b>				
Letters of Greetings, Congratulations, Proclamations Follow-Up	X		X	CEO, Bd Chair, SE
Review programs' quarterly monitoring reports	X			CEO, PP
Review 2022 Draft Corporate Annual Report	X			CEO, Bd Chair, SE

**BOARD OF DIRECTORS  
 2022 TASKS AND TIMELINES**

TASK(S)	ACTION ITEM	TRAINING	SPECIAL EVENT	Committee(s)/ Person Assigned
<b>December</b>				
Review Y-T-D Grant Reports <ul style="list-style-type: none"> <li>Performance</li> <li>Reimbursement</li> <li>In-Kind Match</li> </ul>	X			CEO, Bd Chair, PP
Review Board Fundraising Report	X			CEO, Bd Chair, B/F
Approve proposed grant applications	X			CEO, Bd Chair, PP
Regional Advisory Councils' Annual Meeting Report Format and Review of Committee Needs	X			CEO, Bd Chair, ACR
<b>JANUARY 2023</b>				
<b>Closeout Board Meeting</b>	X			CEO, Bd Chair
Annual Corporate Membership Meeting	X			CEO, Bd Chair
Annual Corporate Luncheon	X		X	CEO, Bd Chair
Installation of Board Members	X			CEO
Recognition of Outgoing Board Members	X			CEO
Recognition of Board Leadership	X			CEO
Recognition of Board Volunteer Services	X			CEO
Recognition of Corporate/Community Services <ul style="list-style-type: none"> <li>Highlight recipients on website</li> </ul>	X			CEO
Review Financial Reports	X			CEO, Bd Chair, B/F
Review Y-T-D Grant Reports <ul style="list-style-type: none"> <li>Performance</li> <li>Reimbursement</li> <li>In-Kind Match</li> </ul>	X			CEO, Bd Chair, PP
Review Board Fundraising Report	X			CEO, Bd Chair, B/F
Approve proposed grant applications	X			CEO, Bd Chair, PP



**CENTRAL REGIONAL ADVISORY COUNCIL  
PROPOSED TASKS & TIMELINES  
2022**

TASK(S)	ACTION ITEM	TRAINING	SPECIAL EVENT	Committee(s)/ Person Assigned
<b>FEBRUARY</b>				
Attend Shared Governance Orientation		X		CEO, BD Chair
<b>MARCH</b>				
<b>CRAC Meeting</b> Finalize Council Meeting Schedule Confirm Council Committee Assignments Review Council Tasks & Timelines Review draft plans for scholarships	X			Full Council
Select Representative to attend FACA Training Conference		X		Full Council
<b>MAY</b>				
<b>CRAC Meeting</b> Review Advisory Council Membership Recruitment Plan Identify Advisory 2021-2022 Legislative Agenda/Plan	X			
<b>JUNE</b>				
Participate in Annual Agency Family Picnic Activities			X	Full Council
<b>AUGUST</b>				
<b>CRAC Meeting</b> Finalize Annual Meeting Plans to Include: Program Booklet Program Participants Location /Caterer Invitation Mail-out Review Council's Membership & Meeting Attendance Certify Council's Corporate Membership Select Individual/Org. for 2022 Comm. Service Award	X			Full Council
<b>OCTOBER</b>				
<b>CRAC Annual Meeting</b> Recognition of Council Volunteer Services Recognition of Outgoing Council Members Installation of 2022-2023 Council Members & Officers	X			Full Council
<b>JANUARY</b>				
2023 Annual Corporate Meeting and Luncheon			X	Full Council

**2022 EASTERN REGION ADVISORY COUNCIL  
PROPOSED TASKS AND TIMELINES**

<b>TASKS</b>	<b>ACTION ITEM</b>	<b>TRAINING</b>	<b>COMMITTEE/MEMBER ASSIGNED</b>
<b>FEBRUARY 2022</b>			
Shared Governance Orientation		X 2/26/2022	FULL COUNCIL
Select FACA Representative	X		
Select FHSA Representative	X		
<b>MARCH 2022</b>			
Council Meeting	X	3/21/2022	FULL COUNCIL
Discussion of the 2021 Timelines	X		Chairperson-Full Council
Discuss Scholarships Start Up	X		Marjorie Gaskin
Scholarship Packets	X		Chairperson/Staff Liaison
Scholarship Update, Ads, and Letter	X		
Approval of Fund Raising Activities	X		
Select Member to Pick up Proclamation	X		
Chairperson of Annual Meeting	X		
Benevolence Fund	X		
Recruitment of ERAC Members	X		
Recognize Jan-March Birthdays	X		B. Richardson, Mercadez Connelly, Gena Spivey, Betty Bradwell, Angela Jules
<b>APRIL 2022 (NO COUNCIL MEETING)</b>			
Secure Proclamation for Community Action Month	X		
Submit Fundraising Activities to BOD for approval	X		Board Member

**2022 EASTERN REGION ADVISORY COUNCIL  
PROPOSED TASKS AND TIMELINES**

<b>MAY 2022</b>			
Council Meeting	<b>X</b>	<b>5/16/2022</b>	<b>FULL COUNCIL</b>
Community Action Month	<b>X</b>		
Fundraising Activities	<b>X</b>		
Scholarship Update, Ads and Letters	<b>X</b>		
Action Plan for Energy Fair	<b>X</b>		
Appoint Annual Mtg. Chairperson	<b>X</b>		
Recognize Birthdays April-July			Constance Griffin, Marjorie Gaskin, Francis Cooper
<b>JUNE 2022(NO COUNCIL MEETING)</b>			
ALPI Annual Agency Picnic			
<b>JULY 2022 (NO COUNCIL MEETING)</b>			
Energy Fair			
Voting Initiative Day & Organize Political Forums			
<b>AUGUST 2022</b>			
Council Meeting	<b>X</b>	<b>8/15/2022</b>	<b>FULL COUNCIL</b>
Deadline for Final Selection of Scholarship Applications	<b>X</b>		Scholarship Committee
Fundraising Update	<b>X</b>		Fundraising Committee
Annual Meeting Program Development	<b>X</b>		
Recognize Birthdays August-December			William Holt, Debra Williams, Tiffany Wilder, Bobby Byrd, Victoria Frazier

**2022 EASTERN REGION ADVISORY COUNCIL  
PROPOSED TASKS AND TIMELINES**

<b>SEPTEMBER 2022</b>			
Selection of Fundraising Activities Completed			
Final Deadline of Scholarship Ads-			
Annual Meeting Booklets			
Energy Fair- Martin County			
<b>OCTOBER 2022</b>			
Annual Meeting	<b>X</b>	<b>10/15/2022</b>	<b>FULL COUNCIL</b>
Installation of 2022-2023 Council Members	<b>X</b>		<b>Program Committee</b>

## ALPI HEAD START/EARLY HEAD START POLICY COUNCIL 2021-2022 MAJOR TASKS AND TIMELINES

<b>October 6-7, 2021</b>	<ul style="list-style-type: none"> <li>▪ Policy Council Orientation/Training               <ul style="list-style-type: none"> <li>○ PowerPoint Presentation</li> <li>○ Roles and Responsibilities</li> <li>○ Election of Officers</li> <li>○ Overview of Policy Council Monthly Meeting Package</li> </ul> </li> </ul>
<b>November 17, 2021</b>	<ul style="list-style-type: none"> <li>▪ Policy Council Monthly Meeting               <ul style="list-style-type: none"> <li>○ Conflict of Interest</li> <li>○ Code of Business Conduct</li> </ul> </li> </ul>
<b>November 19-20, 2021</b>	<ul style="list-style-type: none"> <li>▪ Policy Council participates in the Board of Directors Retreat to review, and discuss items to include but not limited to:               <ul style="list-style-type: none"> <li>○ Review of Program's Long and Short Goals and Objectives</li> <li>○ Target Service Areas</li> <li>○ Program Monitoring Reports</li> <li>○ Program Annual Self-Assessment Report &amp; Corrective Action Plan</li> <li>○ Staff Qualification and Development Report</li> <li>○ School Readiness/Child Outcomes Reports</li> <li>○ Program Funding</li> </ul> </li> </ul>
<b>December 15, 2021</b>	<ul style="list-style-type: none"> <li>▪ Policy Council Meeting               <ul style="list-style-type: none"> <li>○ Approval: Agency Personnel Policies: Standards of Conduct</li> <li>○ Approval: Impasse Procedures</li> </ul> </li> </ul>
<b>January 19, 2022</b>	<ul style="list-style-type: none"> <li>▪ Policy Council Monthly Meeting               <ul style="list-style-type: none"> <li>○ Approval: Selection Criteria Scale</li> </ul> </li> </ul>
<b>January 22, 2022</b>	<ul style="list-style-type: none"> <li>▪ Policy Council participates in the Agency Corporate Meeting/Luncheon</li> </ul>
<b>February 16, 2022</b>	<ul style="list-style-type: none"> <li>▪ Policy Council Monthly Meeting</li> <li>▪ Approval: Operational Policies &amp; Procedures</li> <li>▪ Approval: Fiscal Management Policies &amp; Procedures</li> </ul>
<b>February 26, 2022</b>	<ul style="list-style-type: none"> <li>▪ Policy Council participates in the Annual Board of Directors Orientation</li> </ul>
<b>March 16, 2022</b>	<ul style="list-style-type: none"> <li>▪ Policy Council Monthly Meeting</li> </ul>
<b>April 20, 2022</b>	<ul style="list-style-type: none"> <li>▪ Policy Council Monthly Meeting</li> </ul>
<b>May 18, 2022</b>	<ul style="list-style-type: none"> <li>▪ Policy Council Monthly Meeting</li> </ul>
<b>June 15, 2022</b>	<ul style="list-style-type: none"> <li>▪ Policy Council Monthly Meeting</li> </ul>
<b>June 25, 2022</b>	<ul style="list-style-type: none"> <li>▪ Policy Council participates in the Annual Agency Picnic</li> </ul>
<b>July 18-21, 2022</b>	<ul style="list-style-type: none"> <li>▪ Policy Council participates in the Annual Program Self-Assessment process.</li> </ul>
<p>NOTE: Monthly Policy Council Approval include, but are not limited to: program progress reports, program financial reports, parent committee reports, human resources action, grant applications and/or amendments, etc.</p>	



**NORTHERN REGIONAL ADVISORY COUNCIL  
PROPOSED TASKS & TIMELINES  
2022-2023**

TASK(S)	ACTION ITEM	TRAINING	SPECIAL EVENT	Committee(s)/ Person Assigned
<b>FEBRUARY</b>				
Attend Shared Governance Orientation		X		CEO, BD Chair
<b>MARCH</b>				
<b>NRAC Meeting</b> Finalize Council Meeting Schedule Confirm Council Committee Assignments Review Council Tasks & Timelines Review draft plans for scholarships	X			Full Council
Select Representative to attend FACA Training Conference		X		Full Council
<b>MAY</b>				
<b>NRAC Meeting</b> Review Advisory Council Membership Recruitment Plan Identify Advisory 2022-2023 Legislative Agenda/Plan	X			
<b>JUNE</b>				
Participate in Annual Agency Family Picnic Activities			X	Full Council
<b>AUGUST</b>				
<b>NRAC Meeting</b> Finalize Annual Meeting Plans to Include: Program Booklet Program Participants Location /Caterer Invitation Mail-out Review Council's Membership & Meeting Attendance Certify Council's Corporate Membership Select Individual/Org. for 2022 Comm. Service Award	X			Full Council
<b>OCTOBER</b>				
<b>NRAC Annual Meeting</b> Recognition of Council Volunteer Services Recognition of Outgoing Council Members Installation of 2022-2023 Council Members & Officers	X			Full Council
<b>JANUARY</b>				
2023 Annual Corporate Meeting and Luncheon			X	Full Council

**2022 SOUTHERN REGION ADVISORY COUNCIL  
PROPOSED TASKS AND TIMELINES**

TASKS:	MONTH	COMMITTEE/MEMBER ASSIGNED
Attend Shared Governance Orientation	FEBRUARY	CEO/Board Chair
Distribute '2022' (draft) Calendars		FULL COUNCIL
Distribute '2022' (draft) Tasks and Timelines		
	MARCH	FULL COUNCIL
Confirm '2022' Meeting Calendar		FULL COUNCIL
Review '2022' Tasks & Timeslines		
Review Corporate Applications		
Discuss Seigler, Sims & Wade Scholarship		
Select Rep to attend FACA Conference (TBA)		
	MAY	FULL COUNCIL
Finalize Scholarship Donation		
	JUNE	FULL COUNCIL
Participate in ALPI's Annual Family Day Picnic		Hosted by the Southern Region
	AUGUST	FULL COUNCIL
'2022' Annual Meeting Plans		
Identify Individual/Org for Community Service		
Identify Seigler, Sims & Wade Scholarship Recipient		
	OCTOBER	FULL COUNCIL
2022' Annual Membership Meeting		
	JANUARY	FULL COUNCIL
'2023' Annual Corporate BOD Luncheon		



## HOLIDAY SCHEDULE

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### 560 HOLIDAY SCHEDULE

#### Purpose

Employees are granted twelve holidays in celebration of various occasions throughout the year.

#### II Policy

Twelve holidays are recognized annually in addition to employee leave time.

If one of the holidays occurs on a Saturday, the preceding Friday shall be observed as the holiday. If the holiday falls on a Sunday, the following Monday will be observed as the holiday.

#### III Procedure

At the beginning of each calendar year, the holiday schedule will be identified by the Human Resources Director.

##### A. Holidays

New Year's Day	January 1
Martin Luther King's Birthday	January 15 or day Observed
Presidents' Day	3 <sup>rd</sup> Monday in February
Good Friday	Friday before Easter
Memorial Day	Last Monday in May
Juneteenth	June 19 <sup>th</sup>
Independence Day	July 4 and 5
Labor Day	1 <sup>st</sup> Monday in September
Thanksgiving	Thursday & Friday in November
Veterans' Day	November 11
Christmas	Day Before-Day Of-Day After
Personal Holiday	Floating Holiday

##### B. Leave Eligibility

All regular full-time employees are eligible for holiday time. Eligible employees are regular full-time and regular part-time with at least 20 or more hours of work per week. Probationary employees are eligible for holiday time off 30 days after employment.



## HOLIDAY SCHEDULE

### HOLIDAY SCHEDULE

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A Personal Holiday (Floating Holiday) is granted each calendar year to employees on staff on or before the first working day in January.

#### **C. Holiday Pay**

All regular full-time employees are eligible for holiday pay.

1. Probationary employees are eligible for holiday pay 30 days after employment.
2. Eligible employees shall receive their assigned rate of pay for holiday pay for all regularly scheduled hours not to exceed eight (8) hours per day, but may be less if the normal work schedule is less than the regular eight (8) hours per day work schedule.
3. Employees must work the day before and after a holiday or be on approved leave in order to receive pay for holidays. Approved leave is time off signed or authorized by the supervisor for annual leave, illness, injury, bereavement, jury, military, or personal leave of absence.
4. If a holiday falls in a period of approved absence for which an employee is being paid by the Agency for sick leave, the employee shall be paid holiday pay for the recognized holiday and the hours represented by this pay shall not be charged against the employee's sick leave schedule.

#### **D. Leave During Scheduled Holidays**

If a regular scheduled holiday, indicated on the official holiday schedule, falls during an employee's scheduled annual leave period, equivalent annual leave will be granted.

1. If an employee is scheduled to work on an official holiday, the employee will receive time off for hours worked or earn another day in lieu of the holiday. This time-off should be taken no later than 30 days following the holiday.

# 2022 Board of Directors and Regional Advisory Council Calendar

**\*\* Addresses to Meeting Locations are listed at end of document**

## Regional Advisory Liaisons and Contact Information:

Advisory Region	Liaison	E-Mail Address	Physical Address	Contact
Eastern Region	Donita Brunson	<a href="mailto:dbrunson@alpi.org">dbrunson@alpi.org</a>	2202 Avenue Q, Ft. Pierce, FL	(772) 466-2631
Southern Region	Cheryl Burnham	<a href="mailto:cburnham@alpi.org">cburnham@alpi.org</a>	300 Lynchburg Road, Lake Alfred, FL	(863) 956-3491
Central Region	Pa-Houa Lee-Yang	<a href="mailto:pyang@alpi.org">pyang@alpi.org</a>	300 Lynchburg Road, Lake Alfred, FL	(863) 956-3491
Northern Region	Al Miller	<a href="mailto:amiller@alpi.org">amiller@alpi.org</a>	300 Lynchburg Road, Lake Alfred, FL	(863) 956-3491
Policy Council	Myrna Rodriguez	<a href="mailto:mrodriguez@alpi.org">mrodriguez@alpi.org</a>	2202 Avenue Q, Ft. Pierce, FL	(772) 466-2631

Month/Date	Board of Directors	Policy Council	Eastern	Southern	Central	Northern
<b>January</b>						
January 19 <sup>th</sup>		Administrative Office, Ft. Pierce, 5:30 P.M.				
January 21 <sup>st</sup> – 22 <sup>nd</sup>	Annual Corp. Meeting and Annual Luncheon – B. Resort and Spa, Lake Buena Vista					
<b>February</b>						
February 16 <sup>th</sup>		Administrative Office, Ft. Pierce: 5:30 P.M.				
February 26 <sup>th</sup>	Shared Governance Orientation- DoubleTree SeaWorld, Orlando	Shared Governance Orientation- DoubleTree SeaWorld, Orlando	Shared Governance Orientation- DoubleTree SeaWorld, Orlando	Shared Governance Orientation- DoubleTree SeaWorld, Orlando	Shared Governance Orientation- DoubleTree SeaWorld, Orlando	Shared Governance Orientation- DoubleTree SeaWorld, Orlando
<b>March</b>						
March 5 <sup>th</sup>						Velma Wms Ctr. - Sanford, FL – or Zoom 10:00 A.M.
March 9 <sup>th</sup>					Corp. Office/Zoom 5:30 P.M.	<b>Page 779 of 803</b>

Month/Date	Board of Directors	Policy Council	Eastern	Southern	Central	Northern
March 16 <sup>th</sup>		Administrative Office, Ft. Pierce: 5:30 P.M.				
March 21 <sup>st</sup>			Admin Office/Zoom 6:30 P.M.	Lakeview Park/Zoom 5:30 P.M.		
Month/Date	Board of Directors	Policy Council	Eastern	Southern	Central	Northern
<b>April</b>						
April 8 <sup>th</sup>				Picnic Planning Meeting		
April 20 <sup>th</sup>		Admin Office/Zoom: 5:30 P.M.				
April 22 <sup>nd</sup>	Committee Meetings Zoom – 6:30 P.M.					
April 23 <sup>rd</sup>	Zoom Platform: 10:00 A.M.					
Month/Date	Board of Directors	Policy Council	Eastern	Southern	Central	Northern
<b>May</b>						
May 7 <sup>th</sup>						Velma Wms Center, Sandford/ Zoom : 10:00 A.M.
May 11 <sup>th</sup>					Corp Office/Zoom: 5:30 P.M.	
May 16 <sup>th</sup>			Admin Office/Zoom: 6:30 P.M.	Lake Placid/ Zoom: 5:30 P.M.		
May 18 <sup>th</sup>		Admin Office/Zoom: 5:30 P.M.				

Month/Date	Board of Directors	Policy Council	Eastern	Southern	Central	Northern
<b>June</b>						
June 15 <sup>th</sup>		Admin Office – 5:30 P.M.				
June 24 <sup>th</sup>	Corp. Office – Committees/ Zoom: 7:00 P.M.					
June 25 <sup>th</sup>	Chain O’ Lakes, Winter Haven, 10:00 A.M.					
June 25 <sup>th</sup>	Annual Picnic – Lake Maude, Winter Haven Tentative			Annual Picnic – Host/ Tentative		
Month/Date	Board of Directors	Policy Council	Eastern	Southern	Central	Northern
<b>August</b>						
August 6 <sup>th</sup>						Velma Wms Center, Sanford/ Zoom: 10:00 AM
August 10 <sup>th</sup>					Corp. Office/Zoom: 5:30 P.M.	
August 15 <sup>th</sup>			Admin Office/ Zoom: 6:30 P.M.	Lakeview Park/Zoom: 5:30 PM		
Month/Date	Board of Directors	Policy Council	Eastern	Southern	Central	Northern
<b>September</b>						
September 23 <sup>rd</sup>	Corp Office – Committees/Zoom: 7:00 P.M.					
September 24 <sup>th</sup>	Location TBD: 10:00 A.M.					

Month/Date	Board of Directors	Policy Council	Eastern	Southern	Central	Northern
<b>October</b>						
October 1 <sup>st</sup>					Annual Meeting: Senior Center/ Zoom 1:00 P.M.	
October 5 <sup>th</sup> – 6 <sup>th</sup>		Admin Office/Orientation: 5:30 P.M.				
October 8 <sup>th</sup>						Annual Meeting: Velma Wms Center/Zoom: 10:00 A.M.
October 15 <sup>th</sup>			Annual Meeting: Location TBD/ Zoom: 11 AM			
October 22 <sup>nd</sup>				Annual Meeting Lakeview Center/Zoom: 10:00 A.M.		
Month/Date	Board of Directors	Policy Council	Eastern	Southern	Central	Northern
<b>November</b>						
November 17 <sup>th</sup>						
November 18 <sup>th</sup> – 20 <sup>th</sup>	Retreat – Doubletree Downtown	Retreat – Doubletree Downtown	Retreat – Doubletree Downtown	Retreat-Doubletree Downtown	Retreat – Doubletree Downtown	Retreat – Doubletree Downtown
Month/Date	Board of Directors	Policy Council	Eastern	Southern	Central	Northern
<b>December</b>						
December 15 <sup>th</sup>						
Month/Date	Board of Directors	Policy Council	Eastern	Southern	Central	Northern
<b>January 2023</b>						
January 28 <sup>th</sup>	Annual Meeting – Location TBD	Annual Meeting – Location TBD	Annual Meeting- Location TBD	Annual Meeting - Location TBD	Annual Meeting – Location TBD	Annual Meeting – Location TBD

## *\*\*Meeting Addresses:*

- Chain )' Lakes Complex, 210 Cypress Gardens Blvd, Winter Haven, FL 33880
- ALPI Administrative Office, 2202 Avenue Q, Fort Pierce, FL 34950
- Corporate Office, 300 Lynchburg Road, Lake Alfred, FL 33850
- Velma Williams Community Center, 1203 West 13<sup>th</sup> Street, Sanford, FL 32771
- The Resource Center, 101 Robinson Street, Lake Placid, FL 33852
- Lakeview Park Community Center, 38 Kings Boulevard, Frostproof, FL 33843
- Doubletree by SeaWorld, 10100 International Drive, Orlando, FL 32821
- Doubletree Downtown, 60 S. Ivanhoe Blvd, Orlando, FL 32804

# Sunshine Law Questions and Answers

- **What is the Sunshine Law?**

Florida's Government-in-the-Sunshine law provides a right of access to governmental proceedings at both the state and local levels. It applies to any gathering of two or more members of the same board to discuss some matter which will foresee ably come before that board for action. There is also a constitutionally guaranteed right of access. Virtually all state and local collegial public bodies are covered by the open meetings requirements with the exception of the judiciary and the state Legislature which has its own constitutional provision relating to access.

- **What are the requirements of the Sunshine law?**

The Sunshine law requires that 1) meetings of boards or commissions must be open to the public; 2) reasonable notice of such meetings must be given, and 3) minutes of the meeting must be taken.

- **What agencies are covered under the Sunshine Law?**

The Government-in-the-Sunshine Law applies to "any board or commission of any state agency or authority or of any agency or authority of any county, municipal corporation or political subdivision." Thus, it applies to public collegial bodies within the state at both the local as well as state level. It applies equally to elected or appointed boards or commissions.

- **Are federal agencies covered by the Sunshine Law?**

Federal agencies operating in the state do not come under Florida's Sunshine law.

- **Does the Sunshine Law apply to the Legislature?**

Florida's Constitution provides that meetings of the Legislature be open and noticed except those specifically exempted by the Legislature or specifically closed by the Constitution. Each house is responsible through its rules of procedures for interpreting, implementing and enforcing these provisions. Information on the rules governing openness in the Legislature can be obtained from the respective houses.

- **Does the Sunshine Law apply to members-elect?**

Members-elect of public boards or commissions are covered by the Sunshine law immediately upon their election to public office.

- **What qualifies as a meeting?**

The Sunshine law applies to all discussions or deliberations as well as the formal action taken by a board or commission. The law, in essence, is applicable to any gathering, whether formal or casual, of two or more members of the same board or commission to discuss some matter on which foreseeable action will be taken by the public board or commission. There is no requirement that a quorum be present for a meeting to be covered under the law.

- **Can a public agency hold closed meetings?**

There are a limited number of exemptions which would allow a public agency to close a meeting. These include, but are not limited to, certain discussions with the board's attorney over pending litigation and portions of collective bargaining sessions. In addition, specific portions of meetings of some agencies (usually state agencies) may be closed when those agencies are making probable cause determinations or considering confidential records.

- **Does the law require that a public meeting be audio taped?**

There is no requirement under the Sunshine law that tape recordings be made by a public board or commission, but if they are made, they become public records.

- **Can a city restrict a citizen's right to speak at a meeting?**

Public agencies are allowed to adopt reasonable rules and regulations which ensure the orderly conduct of a public meeting and which require orderly behavior on the part of the public attending. This includes limiting the amount of time an individual can speak and, when a large number of people attend and wish to speak, requesting that a representative of each side of the issue speak rather than every one present.

- **As a private citizen, can I videotape a public meeting?**

A public board may not prohibit a citizen from videotaping a public meeting through the use of nondisruptive video recording devices.

- **Can a board vote by secret ballot?**

The Sunshine law requires that meetings of public boards or commissions be "open to the public at all times." Thus, use of preassigned numbers, codes or secret ballots would violate the law.

- **Can two members of a public board attend social functions together?**

Members of a public board are not prohibited under the Sunshine law from meeting together socially, provided that matters which may come before the board are not discussed at such gatherings.

- **What is a public record?**

The Florida Supreme Court has determined that public records are all materials made or received by an agency in connection with official business which are used to perpetuate, communicate or formalize knowledge. They are not limited to traditional written documents. Tapes, photographs, films and sound recordings are also considered public records subject to inspection unless a statutory exemption exists.

- **Can I request public documents over the telephone and do I have to tell why I want them?**

Nothing in the public records law requires that a request for public records be in writing or in person, although individuals may wish to make their request in writing to ensure they have an accurate record of what they requested. Unless otherwise exempted, a custodian of public records must honor a request for records, whether it is made in person, over the telephone, or in writing, provided the required fees are paid. In addition, nothing in the law requires the requestor to disclose the reason for the request.

- **How much can an agency charge for public documents?**

The law provides that the custodian shall furnish a copy of public records upon payment of the fee prescribed by law. If no fee is prescribed, an agency is normally allowed to charge up to 15 cents per one-sided copy for copies that are 14" x 8 1/2" or less. A charge of up to \$1 per copy may be assessed for a certified copy of a public record. If the nature and volume of the records to be copied requires extensive use of information technology resources or extensive clerical or supervisory assistance, or both, the agency may charge a reasonable service charge based on the actual cost incurred.

- **Does an agency have to explain why it denies access to public records?**

A custodian of a public record who contends that the record or part of a record is exempt from inspection must state the basis for that exemption, including the statutory citation. Additionally, when asked, the custodian must state in writing the reasons for concluding the record is exempt.

- **When does a document sent to a public agency become a public document?**

As soon as a document is received by a public agency, it becomes a public record, unless there is a legislatively created exemption which makes it confidential and not subject to disclosure.

- **Are public employee personnel records considered public records?**

The rule on personnel records is the same as for other public documents ... unless the Legislature has specifically exempted an agency's personnel records or authorized the agency to adopt rules

limiting public access to the records, personnel records are open to public inspection. There are, however, numerous statutory exemptions that apply to personnel records.

- **Can an agency refuse to allow public records to be inspected or copied if requested to do so by the maker or sender of the documents?**

No. To allow the maker or sender of documents to dictate the circumstances under which documents are deemed confidential would permit private parties instead of the Legislature to determine which public records are public and which are not.

- **Are arrest records public documents?**

Arrest reports prepared by a law enforcement agency after the arrest of a subject are generally considered to be open for public inspection. At the same time, however, certain information such as the identity of a sexual battery victim is exempt.

- **Is an agency required to give out information from public records or produce public records in a particular form as requested by an individual?**

The Sunshine Law provides for a right of access to inspect and copy existing public records. It does not mandate that the custodian give out information from the records nor does it mandate that an agency create new records to accommodate a request for information.

- **What agency can prosecute violators?**

The local state attorney has the statutory authority to prosecute alleged criminal violations of the open meetings and public records law. Certain civil remedies are also available.

- **What is the difference between the Sunshine Amendment and the Sunshine Law?**

The Sunshine Amendment was added to Florida's Constitution in 1976 and provides for full and public disclosure of the financial interests of all public officers, candidates and employees. The Sunshine Law provides for open meetings for governmental boards

- **How can I find out more about the open meetings and public records laws?**

Probably the most comprehensive guide to understanding the requirements and exemptions to Florida's open government laws is the Government-in-the-Sunshine manual compiled by the Attorney General's Office. The manual is updated each year and is available for purchase through the First Amendment Foundation in Tallahassee. For information on obtaining a copy, contact the **First Amendment Foundation at (850) 224-4555.**

# BOARD & ADMINISTRATOR

## FOR BOARD MEMBERS

EDITOR: NICHOLAS KING

### Lots of issues to consider when mulling a board expansion

Depending on where your nonprofit is in its development, the prospect of adding some more members to the board has likely come up—or is on the horizon. At some point, it is natural for boards and executive leadership to wonder if existing board members are capable of providing the requisite resources and expertise necessary for the organization to reach its full potential.

Experts say there are lots of things to take into account when moving from a very small organization where the board members do a lot—or all—of the actual work at the group, to where boards transition to more of a leadership/management type role. And then, other considerations come into play when expanding the size of the board once the nonprofit is well-established.

“Our organizations’ boards of trustees are vital to creating and building innovative and collaborative organizations focused on the common good,” explained Rita Fuerst Adams, a fundraising and leadership consultant.

At their best, she said, board members:

- Lead our organization’s activities and program effectiveness, and our fund development for contributions and other sources of revenue.
- Develop and grow our organization and each person’s talents.
- Represent our communities, those we serve, givers and all who drive our work.

“At times, our trustees roll up their sleeves and work side-by-side with us. However, we need our trustees to ask the tough questions, inspire our teams to think bigger, and challenge our thinking,” she said.

An organization’s founders connect with people who admire their passion and understand their idea, Fuerst said. It is an effective way to start. However, as the organization expands, its

founders find they need a board that questions, challenges, and builds community, she said.

“How many trustees does our organization need? Engaging and managing a board of 9 to 15 trustees is challenging. For startups, beginning with 5 to 7 trustees may be a comfortable and productive number. What every organization must realize is it takes time and expertise for trustees to be productive,” she said.

“Boards often grow in number to reflect our community,” she noted.

“When we look around the table, do we see our community? We each bring a unique voice to the table. Do our values create an environment where our trustees respect and encourage each other? Are we listening to their unique voices?”

These are all important issues that should be addressed when deciding the size of a board, especially in light of the important work that the charitable sector provides, she added.

“Nonprofit organizations are the one element of our society bringing us together, government, business, and philanthropy, to focus on our common good. It is the one element of our society that can change hearts and build community,” she said.

#### For more information

Rita Fuerst Adams is a leadership, organizational and fund development consultant. She transforms nonprofit/social impact organizations into better-funded, more effective organizations and builds internal and external teams to increase and diversify funding. She is dedicated to serving social problem solvers and their new and emerging organizations. Fuerst Adams has taught entrepreneurship for nonprofits as part of a master’s in nonprofit organization management. *For more information, visit <https://www.linkedin.com/in/ritafuerstadam>.* ■

## Board members could serve past their terms if needed and bylaws allow

In most cases, bringing on a new board member is an orderly process thanks to the predictability of board terms. The organization knows when each board member's term ends and is able to recruit and approve new members to take their place.

But sometimes, the organization is unable to recruit new members to replace departing ones before their terms ends. According to Benjamin Takis, co-founder of Sustainability Education 4 Nonprofits, that doesn't necessarily mean your board is short on members—a situation that could potentially lead to headaches due to quorum requirements, for example.

In fact, the departing board members likely may continue to serve on the board, even though their term has expired, until new members are recruited and approved.

"The status of Board members whose terms have expired depends on the organization's Bylaws and the applicable state nonprofit corporation statute," Takis recently explained on his organization's blog.

"The law in many states is that unless the organization's Articles of Incorporation or Bylaws provide otherwise, Directors continue to serve past the expiration of their term until a successor is elected and takes office. This often applies to Officer positions as well."

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*"The law in many states is that unless the organization's Articles of Incorporation or Bylaws provide otherwise, Directors continue to serve past the expiration of their term until a successor is elected and takes office."*

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Takis noted that if the state nonprofit corporation statute applicable to your organization has a similar provision, and your organization's articles and bylaws are silent on the issue, then these individuals will continue to be deemed board members and any meetings or actions taken since the expiration of their term will be unaffected by the technical expiration of their term.

"Regardless, formally replacing or re-electing these Board members should be a high priority," Takis said.

"Amending the Bylaws to include language specifically adopting this 'holdover' rule would help to avoid confusion in the future, as many people are not aware of the intricate details of state law on matters like these."

For more information, visit <https://www.se4nonprofits.com>. ■

## Revisit bylaws as new year begins

The start of a new year is a good time for boards to revisit their bylaws and make sure they are updated and serving the organization's needs for the coming year.

According to Lena Eisenstein of BoardEffect, nonprofit leaders and their boards should review their bylaws on an annual basis, as well as any time there's a major change in the nonprofit—like a merger with another organization, a move to a new location in another state or a substantial expansion of services.

In a blog post on this topic, Eisenstein listed some examples of changes to an organization's bylaws, which include:

- Increasing the number of directors.
- Changing the terms and limits for the board of directors.
- Adding a board director officer position.
- Changing the quorum requirements or making them more specific.

- Amending the rules for required notice of meetings.
- Adding rules for virtual meetings and hybrid meetings.
- Changing the rules for member dues and qualifications for membership-based nonprofits.
- Removing overly specific language in the document.
- Creating an executive board, an advisory board or an emeritus board.
- Changing the board's voting rules.

Regardless of which type of change is being considered, Eisenstein said, the actual drafting of the revision may be best left to a board member with experience in this area—especially if the board is making its first amendment to the bylaws.

As an alternative, she said, you might want to ask for help from an experienced board member from outside the organization.

For more information, visit <https://www.boardeffect.com>. ■



## Training and Professional Development Opportunities

Region IV Head Start Association: February 15 – 18, 2022: Atlanta, GA

Florida Head Start Association (FHSA): March 2-4, 2022: Orlando, FL

Florida Association of Community Action (FACA): May 11-13, 2022: Ft. Lauderdale, FL

CAPLAW Conference: June 28 – 30, 2022: Chicago, IL

The Southeastern Association of Community Action Agencies (SEACAA): October 18-21, 2022: Biloxi, MS

National Community Action Partnership (NCAP): August 30 – September 1: New York, NY

The National Community Action Foundation (NCAF) - Virtual

LOCAL, STATE, REGIONAL & NATIONAL MEMBERSHIPS



G R E A T E R

Winter Haven  
Chamber of Commerce

Florida Association for Community Action  
(FACA)

Florida Head Start Association  
(FHSA)

Region IV Head Start Association  
(RIVHSA)

Southeastern Association for Community Action  
(SEACAA)

Community Action Program Legal Services  
(CAPLAW)

National Community Action Foundation  
(NCAF)

National Community Action Partnership  
(NCAP)

National Head Start Association  
(NHSA)

# PROCLAMATION

## City of Auburndale State of Florida

### IN HONOR OF THE 54<sup>th</sup> ANNIVERSARY OF THE AGRICULTURAL AND LABOR PROGRAM, INC.

**WHEREAS**, The Agricultural and Labor Program, Inc. (ALPI) is a private, non-profit, community based organization that has been helping people and changing lives since 1968;

**WHEREAS**, The theme for the 54<sup>th</sup> Annual Corporate Meeting is *"True to Our Mission... Forging a New Direction During the Pandemic"*.

**WHEREAS**, The ALPI provides community services that make a profound and lasting difference in the lives of children, families, and farmworkers including: Head Start/Early Head Start and Child Development Services;

**WHEREAS**, In 2021, ALPI provided the Auburndale area and Polk County with Energy Assistance, Child and Family Development, Elderly Home Energy Assistance, Affordable Housing, Employment Support Services, and their Child Care Food Program; and

**WHEREAS**, The Agricultural and Labor Program Inc. continues to help the socially and economically disadvantaged children and families achieve and maintain family stability and economic self-sufficiency.

**NOW, THEREFORE**, I Dorothea Taylor Bogert by virtue of the authority vested in me as Mayor, do hereby proclaim January 22, 2022, as:

### **THE AGRICULTURAL AND LABOR PROGRAM, INC. 54<sup>th</sup> ANNIVERSARY DAY**

in Auburndale, Florida in recognition and appreciation of the services provided by this agency.



IN WITNESS WHEREOF, I have hereunto set my hand and caused the Seal of the City of Auburndale to be affixed this 20<sup>th</sup> day of December, A.D., 2021.

  
Dorothea Taylor Bogert, Mayor



# Proclamation

**WHEREAS**, the Agricultural and Labor Program, Inc. is a direct descendent of The Agricultural and Labor Project, established in 1968, by The Coca-Cola Company to improve the quality of life for farm workers in their Florida citrus operations; and

**WHEREAS**, in 2021, the organization provided a constant flow of community support services and made a profound and lasting difference in the lives of our local children, families, and farmworkers.

- **Energy Assistance:** 14,293 families were served.
- **Child and Family Development:** 826 children enrolled, and 30 families received job training.
- **Elderly Home Energy Assistance Program:** 828 seniors received energy assistance.
- **Housing:** 57 affordable housing units were successfully maintained.
- **Child Care Food Program:** 219,520 meals were served.
- **Employment Support:** 16 adults received employment support and 10 received vocational training.

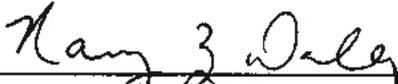
**WHEREAS**, the theme for the 54<sup>th</sup> Annual Corporate Meeting and Luncheon is "True to Our Mission...Forging a New Direction During the Pandemic"; and

**WHEREAS**, the Agricultural and Labor Program, Inc. has consistently placed a high priority on local partnerships and collaboration efforts to better maximize the use of limited federal, state, and local resources and the City of Lake Alfred is proud of its community efforts.

**Now, therefore BE IT PROCLAIMED** the City of Lake Alfred supports the 54<sup>th</sup> Annual Corporate Luncheon on January 22, 2022, and encourages all citizens to honor, recognize, and support the services provided by the Agricultural and Labor Program to our community.

**IN WITNESS WHEREOF**, I have hereunto set my hand this 10<sup>th</sup> day of January 2022.



  
\_\_\_\_\_  
Nancy Z. Daley, Mayor  
City of Lake Alfred, Florida



December 14, 2021

Ms. Arlene Dobison  
Chief Executive Officer  
The Agricultural and Labor Program, Inc.  
300 Lynchburg Road  
Lake Alfred, FL 33850

Dear Ms. Dobison:

On behalf of the City of Bartow, it is my pleasure to acknowledge the 54 years of service provided by the Agricultural and Labor Program, Inc. to the most vulnerable of our county's citizens ... migrant farmworkers and low-income citizens.

The services you provide, in "helping people to help themselves" and your dedication to the citizens of the Bartow community is greatly appreciated.

Congratulations to you on the many achievements of the Agricultural and Labor Program, Inc. and best wishes for a successful 2022 Annual Meeting and Luncheon!

City of Bartow, Florida

Vice Mayor Steve Githens

**Dr. Martha Santiago, Chair**  
Commissioner, District 4



330 W Church Street  
Drawer BC01  
P O Box 9005  
Dr. Bartow, FL 33831-9005  
Tel: (863) 534-6422  
Fax: (863) 534-7655  
[MarthaSantiago@polk-county.net](mailto:MarthaSantiago@polk-county.net)

*Board of County Commissioners*

December 15, 2021

Arlene Dobison, CCAP, NCRI  
Chief Executive Officer  
The Agricultural and Labor Program, Inc.  
300 Lynchburg Road  
Lake Alfred, FL 33850

Dear Ms. Dobison,

On behalf of the Polk County Board of County Commissioners, I thank you for your commitment to serve the children and families in our community. Thank you for embracing the diversity of our county and empowering people to achieve a greater life.

ALPI is a tremendous asset to the county's workforce, education, economic development, and standard of living. You change lives and we are forever grateful for your service.

The Polk County Board of County Commissioners fully supports and applauds ALPI's mission and outreach in our community.

Best wishes during your 54<sup>th</sup> Annual Meeting and for the coming year.

Sincerely,

Dr. Martha Santiago, Chair  
County Commissioner, District 4



December 14, 2021

Ms. Arlene Dobison  
Chief Executive Officer  
The Agricultural and Labor Program, Inc.  
300 Lynchburg Road  
Lake Alfred, FL 33850

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Congratulations to you on the many achievements of the Agricultural and Labor Program, Inc. and best wishes for a successful 2022 Annual Meeting and Luncheon!

City of Bartow, Florida

Vice Mayor Steve Githens



H. WILLIAM MUTZ  
MAYOR

January 22, 2022

Arlene Dobison, Chief Executive Officer  
The Agricultural and Labor Program, Inc.  
300 Lynchburg Road  
Lake Alfred, FL 33850-2576

Dear Ms. Dobison:

As Mayor of the City of Lakeland, and on behalf of my colleagues on the City Commission, I would like to affirm our support of the mission and guiding principles of the Agricultural and Labor Program, Inc. (ALPI).

The City of Lakeland believes ALPI is an integral component to improving the quality of life for the children and families of our community. Your advocacy and program delivery role are to be commended as we encourage you to look for ways to continuously improve, while engaging the broader community to assist you in your efforts.

Congratulations to you on the many achievements of ALPI and best wishes for a successful 2022 Annual Meeting!

Best wishes to you all.

H. William Mutz  
Mayor



*City of Naples*

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**TERESA LEE HEITMANN**  
MAYOR

**PROCLAMATION**

**WHEREAS** The Agricultural and Labor Program, Inc. (ALPI), headquartered in Lake Alfred, Florida, is an IRS certified 501(c)(3) private, nonprofit organization whose Mission is to collaborate with community partners and deliver human service programs that empower the economically disadvantaged and others to be self-sufficient; in service areas including Collier, Glades, Hendry, Highlands, Martin, Polk, St. Lucie, and Volusia Counties; and

**WHEREAS** the underlying principles that guide ALPI activities are involvement of people; emphasis on long-term accomplishments rather than promises; assurances of economic viability; emphasis on self-help; and a sound, integrated, total systems approach over five main areas of activity, including: 1. Employment and Income; 2. Organization Development and Support; 3. Housing; 4. Community Relations and Support; 5. Health, Education, and Social Services; and

**WHEREAS** In 2020-2021, the need of children, families, and elders were addressed through programs such as Community Services Block Grant; Farmworker Emergency Assistance; Head Start/Early Head Start and School Readiness Opportunities Child Care Food and Nutrition Services; HUD Housing Counseling; LIHEAP Services (Low Income Home Emergency Assistance Program); and

**WHEREAS** The ALPI 54<sup>th</sup> Annual Corporate Meeting and Luncheon is being held Saturday, January 22, 2022, celebrating 54 years of community service, "True to Our Mission...Forging a New Direction During the Pandemic."

**NOW, THEREFORE, I, Teresa Heitmann**, by virtue of the authority vested in me as Mayor of the City of Naples, Florida, do hereby proclaim gratitude and support to the Agricultural and Labor Program, Inc., for its compassionate and well-organized delivery of services to provide and empower children, families, farmworkers and elders with dignity and accomplishment.

**IN WITNESS THEREOF**, I have hereunto set my hand this 11th day of January 2022.

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**Teresa Heitmann, MAYOR**



# PROCLAMATION

**WHEREAS**, The Agricultural and Labor Program, Inc. (ALPI) is a private non-profit organization that faithfully serves the total spectrum of socially and economically disadvantaged children, families and farmworkers throughout Florida; and

**WHEREAS**, ALPI has been providing a constant flow of community services and making a profound and lasting difference in the lives of children, families and farmworkers since 1968; and

**WHEREAS**, in 2021, ALPI realized the following outcomes:

- **Energy Assistance:** 14,293 families were served.
- **Child and Family Development:** 826 children enrolled and 30 families received job training.
- **Elderly Home Energy Assistance Program:** 828 seniors received energy assistance.
- **Housing:** 57 affordable housing units were successfully maintained.
- **Child Care Food Program:** 219,520 meals were served.
- **Employment Support:** 16 adults received employment support and 20 received vocational training.

**NOW, THEREFORE**, in recognition of the services needed by those less fortunate in our community, the Mayor and City Commission of the City of Clewiston express and proclaim their respect and appreciation of The Agricultural and Labor Program, Inc.

Kristine Petersen, Mayor

Mary K. Combass, City Clerk



# Proclamation

**WHEREAS**, the Agricultural and Labor Program, Inc. is a direct descendent of The Agricultural and Labor Project, established in 1968, by The Coca-Cola Company to improve the quality of life for farm workers in their Florida citrus operations; and

**WHEREAS**, in 2021, the organization provided a constant flow of community support services and made a profound and lasting difference in the lives of our local children, families, and farmworkers.

- **Energy Assistance:** 14,293 families were served.
- **Child and Family Development:** 826 children enrolled, and 30 families received job training.
- **Elderly Home Energy Assistance Program:** 828 seniors received energy assistance.
- **Housing:** 57 affordable housing units were successfully maintained.
- **Child Care Food Program:** 219,520 meals were served.
- **Employment Support:** 16 adults received employment support and 10 received vocational training.

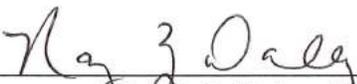
**WHEREAS**, the theme for the 54<sup>th</sup> Annual Corporate Meeting and Luncheon is "True to Our Mission...Forging a New Direction During the Pandemic"; and

**WHEREAS**, the Agricultural and Labor Program, Inc. has consistently placed a high priority on local partnerships and collaboration efforts to better maximize the use of limited federal, state, and local resources and the City of Lake Alfred is proud of its community efforts.

**Now**, therefore BE IT PROCLAIMED the City of Lake Alfred supports the 54<sup>th</sup> Annual Corporate Luncheon on January 22, 2022, and encourages all citizens to honor, recognize, and support the services provided by the Agricultural and Labor Program to our community.

**IN WITNESS WHEREOF**, I have hereunto set my hand this 10<sup>th</sup> day of January 2022.



  
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Nancy Z. Daley, Mayor  
City of Lake Alfred, Florida

**Dr. Martha Santiago, Chair**  
Commissioner, District 4



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*Board of County Commissioners*

December 15, 2021

Arlene Dobison, CCAP, NCRI  
Chief Executive Officer  
The Agricultural and Labor Program, Inc.  
300 Lynchburg Road  
Lake Alfred, FL 33850

Dear Ms. Dobison,

On behalf of the Polk County Board of County Commissioners, I thank you for your commitment to serve the children and families in our community. Thank you for embracing the diversity of our county and empowering people to achieve a greater life.

ALPI is a tremendous asset to the county's workforce, education, economic development, and standard of living. You change lives and we are forever grateful for your service.

The Polk County Board of County Commissioners fully supports and applauds ALPI's mission and outreach in our community.

Best wishes during your 54<sup>th</sup> Annual Meeting and for the coming year.

Sincerely,

Dr. Martha Santiago, Chair  
County Commissioner, District 4

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