

Tri-County Community Council, Inc.
Head Start/Early Head Start

Part: 1302 Program Operations
Subpart: A- Eligibility, Recruitment, Selection, Enrollment, and Attendance
Section: 1302.12 Determining, Verifying, and Documenting Eligibility
Subject: Eligibility

Policy

It is the policy of Tri-County Head Start/Early Head Start Program to review all applications for services to ensure that only qualified families are enrolled into the program. Any family enrolled into Tri-County Head Start/Early Head Start must have eligibility documentation reviewed and signed by the Family Services Coordinator and all documentation must be kept with the client file until that file is destroyed.

Procedure

1. To determine eligibility for Head Start/Early Head Start services, program staff must:
 - a. Conduct an in-person or telephone interview with each family.
 - b. Document meeting on the applicant interview form.
 - c. The Family Service Advocate or Center Director will review the application to see if it is completed and includes proof of income, proof of categorical eligibility and a copy of the child's birth certificate is recommended, but not required.
 - d. Forward the completed application to the Family Services Coordinator.
2. The Family Services Coordinator will verify all information provided to ensure that a child is an eligible age to participate in Head Start/Early Head Start, and that the family qualifies as eligible under the criteria described in this policy.
3. Applications will be forwarded to two ERSEA trained staff members to verify eligibility documentation, calculate the income and age of child. If all is correct, staff will sign and date the ERSEA verification form.
4. Copy of verification form is submitted to Head Start/Early Head Start Director only when follow-up is needed.
5. An Eligibility Determination Record must be created for each applicant which includes the HS/EHS Intake Application, and any provided documents related to the eligibility of the applying family.

1. Age Eligibility and Verification

- a. Children who are 36 months of age or below are age eligible for the EHS Program.
- b. Children ages three to five are age eligible for the HS program.
- c. Program staff must verify the age of a child whose parent or guardian are applying for HS/EHS services. Age may be verified by examination of birth certificate, hospital birth record, medical record, or other official documents.
 - i. Age verification documents will be collected, when possible, unless doing so creates a barrier for the family to enroll the child.

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2. Income and Categorical Eligibility

- a. Program staff must verify a family's eligibility based on income or categorical status. A pregnant woman or child is eligible for HS/EHS services if:
 - i. the family's income is equal to or below the federal poverty line.
 - ii. the family is eligible or, in the absence of childcare, would be potentially eligible for public assistance. Public assistance includes only:
 1. Temporary Assistance for Needy Families (TANF)
 2. Supplemental Security Income (SSI)
 3. Supplemental Nutrition Assistance Program (SNAP)
 4. The child or pregnant woman is homeless as defined in part 1305.
 - iii. The child is in foster care.
- b. If a family does not meet the criteria as listed, the program may enroll a child or pregnant woman who would benefit from EHS services, provided that these participants make up no more than 10% of the program's enrollment. Priority for this 10% includes children with disabilities.
- c. A program may enroll an additional 35% of families whose income is below 130% of the poverty line but currently Tri-county Head Start has not implemented this procedure as we consider those at 100-130% of the poverty line as over-income.

3. Verifying Income and Categorical Eligibility

- a. To verify eligibility based on income:
 - i. Program staff must use tax forms, pay stubs, or other proof of income to determine the family income for the relevant time period.
 - ii. The relevant time period is defined as:
 1. The 12 months preceding the month in which the application is submitted; or
 2. The calendar year preceding the calendar year in which the application is submitted.
 - iii. If a family cannot provide tax forms, pay stubs, or other proof of income for the relevant time period, staff may accept written statements from employers, including individuals who are self-employed, that identify income amounts.
 - iv. To calculate annual income, the following multipliers should be used:
 1. For weekly income, multiply the average gross amount received by 52.
 2. For income received every two weeks, multiply the average gross amount received by 26.
 3. For income received every month, multiply the average gross amount received by 12.
 4. Hourly wages may also be used to calculate annual income by using the following formula: Average Hours Worked Per Week X Hourly Wage X 52.

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- v. For families who work seasonally, the annual income amount may be prorated accordingly based on the number of weeks or months worked.
- vi. If a family reports no income for the relevant time period, HS/EHS may accept the family's SIGNED Declaration of No Income. In this case, staff should attempt to verify information regarding the applying family's eligibility status by the third-party permission to contact form. Written consent from the family is required before attempting to contact any third party. Once eligibility has been confirmed, staff should document the confirmation using the applicant interview form.
- vii. If the third-party permission to contact form is not used and the applying family does not give written consent to contact a third party, then the family's SIGNED declaration of no income may be accepted.
- b. To verify eligibility based on public assistance:
 - i. Program staff must use documentation from the state or local agency that shows that the family receives public assistance (TANF, SSI, or SNAP), or shows that the family is potentially eligible to receive public assistance in the absence of childcare.
- c. To verify eligibility based on a family's homelessness status:
 - i. Documentation from a homeless services provider, school personnel, or other service agency attesting that the family is experiencing homelessness may be used as verification of a family's eligibility for services.
 - ii. Any other documentation that indicates that the applying family is experiencing homelessness, including documentation from a public or private entity, a declaration, information gathered on enrollment or application forms, or notes from interviews with staff to establish a family's homelessness status are also acceptable to be used as evidence of a family's eligibility for services.
 - iii. If it is necessary to gain information from third parties regarding the family's homelessness status, the third-party permission to contact form may be used. Should verbal confirmation be necessary, written consent must be obtained from the applying family and any confirmation of the family's homelessness status should be documented on the applicant interview form.
- d. To verify eligibility for children in foster care:
 - i. To verify eligibility for children in foster care, HS/EHS may accept a court order, placement letter, or proof of a foster care payment.

4. Eligibility Duration

- a. If a child or pregnant woman is determined to be eligible for HS/EHS services, that individual will remain eligible for one year from the date of application. Applications expire after one year and must be renewed at that time. Updated eligibility information and documents must be collected when renewing an application.
- b. A child who becomes enrolled in the EHS program remains eligible for the

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- duration of time that he or she is enrolled in the program.
- c. A child returning to the Head Start program for a third year must complete the Intend to Return form and the family will have to update enrollment forms with the staff before the new school year.
 - d. Children enrolled as income eligible that are transitioning from Early Head Start to Head Start must have eligibility reverified.
 - e. If a family applied but is not enrolled during the year that the family applied, then that family must submit updated income for reverification.
 - f. If a family is over-income the first year, then they must reapply annually to determine if a needier family needs to be considered for enrollment.
 - g. If a child is in foster care or is homeless and is moving to a different service area, staff will make every effort to maintain the child's enrollment and will assist in the child's transition to a program in another service area according to the family's needs.
 - h. If a child exits the program for less than 30 days and the family wishes to re-enroll, eligibility does not need to be reverified.

5. Documenting Eligibility

- a. The program must keep records for each participant. These records should include the intake application and any documents related to the family's eligibility status.
- b. Records may be kept digitally, by hard copy, or both. HS/EHS standard is to maintain both a hard copy and a digital copy of any applications received, including eligibility determination documents.
- c. Eligibility determination records must include, at a minimum, the following:
 - i. Copies of any documents or statements, including declarations, that are necessary to verify the age of eligible children and the income or categorical eligibility of the applying family.
 - ii. A statement that staff has made reasonable efforts to verify information by:
 - 1. Conducting an in-person or telephone interview with the applying family.
 - 2. Describing efforts made to verify eligibility, such as collecting documents from third parties, family's written consent to contact each third party; the third parties' names, titles, and affiliations, and information given regarding the family's eligibility.
 - iii. A statement that identifies the family's eligibility category.
 - 1. The family's income is below income guidelines for its size and lists family size.
 - 2. The family is eligible for, or in the absence of childcare, potentially eligible for public assistance.
 - 3. The child is homeless or placed in foster care.
 - iv. The program must keep eligibility determination records for those currently enrolled, as long as they are enrolled, and for five years after they either have stopped receiving services or are no longer enrolled.

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- 6. Falsification of eligibility documents in any form will not be tolerated.**
- a. Any staff who intentionally violates federal and program eligibility determination regulations and enroll families that are not eligible to receive services will be considered placing the program at risk and will be reprimanded through guidance of the Administrative Offices of Tri-County and the policies and procedures that govern the entire agency.
 - i. Staff will submit all information submitted by family with application.
 - ii. Staff will report possible false information provided by the family to the Family Service Coordinator or Director.
 - iii. Staff will verify all criteria on application before selection of child.
 - iv. Staff withholding any information will face disciplinary action.