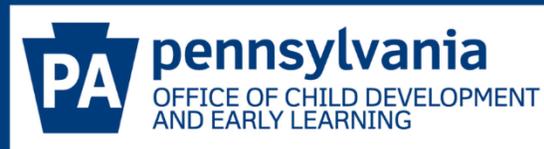


ANNOUNCEMENT

ELRC 21-03



Pennsylvania Office of Child Development and Early Learning
Bureau of Early Learning Policy and Professional Development

Issue Date: June 21, 2021

Effective Date: June 21, 2021

End Date: N/A

Subject: Eligibility and Process for Extending Keystone STAR 4 Reciprocity to Head Start and Early Head Start Federal Grantee Locations

To: Head Start and Early Head Start Federal Grantees
Early Learning Resource Centers (ELRCs)
Head Start State Collaboration Office (HSSCO)
Office of Child Development and Early Learning (OCDEL) Staff

From: Tracey Campanini
Deputy Secretary, Office of Child Development & Early Learning

A handwritten signature in black ink that reads 'Tracey Campanini'.

PURPOSE

To provide information on the eligibility for Head Start (HS) and Early Head Start (EHS) programs, operating under a federal HS/EHS grantee, to receive STAR 4 reciprocity and the processes to be followed by the following agencies:

- HS/EHS federal grantees
- Head Start State Collaboration Office (HSSCO)
- Early Learning Resource Centers (ELRC)
- Office of Child Development and Early Learning (OCDEL)

The following documents are attached to this announcement:

- *Head Start and Early Head Start Location Demographic Spreadsheet*
- *HS/EHS Reciprocity Letter* (updated)
- *Keystone STARS Attestation for Head Start and Early Head Start Grantees* (updated)
- *Agency Roles and Responsibilities Related to HS/EHS Reciprocity* (updated)
- *Flowchart for Determining Keystone STARS Level: Head Start/Early Head Start with DHS Certified Child Care* (updated)

This policy announcement will make obsolete the following Policy Communications and all accompanying documents in their entirety effective immediately:

- ELRC Policy Communication (KS) 18 #09 Process for Determining STAR Level for Head Start and Early Head Start with DHS Child Care
- ELRC Policy Communication (KS) 19 #07 Updated Process for Determining STAR Level for HS/EHS Program with DHS Certified Child Care

BACKGROUND

OCDEL recognizes HS and EHS programs as high-quality early childhood learning environments and as such, has established a process for extending the highest STAR level, STAR 4, to eligible HS/EHS locations. The Head Start Performance Standard 1302 Subpart E-Family and Community Engagement Program Services, 45 CFR 1302.53(b)(2) states¹:

(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.

(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.

Since July 2017, focus groups have worked to develop protocol on how to best incorporate federally funded HS and EHS grantees with locations where they operate Department of Human Services (DHS) certified child care locations, or have entered into a partnership with a community provider to provide child care, into Keystone STARS. This work has been thorough and involved representatives from OCDEL, the Pennsylvania Key, HSSCO, PA Pre-K Counts, and the ELRCs.

DISCUSSION

OCDEL has established the following process through which STAR 4 reciprocity will be extended to all locations under a HS/EHS grantee's Master Provider Index (MPI) number.

¹ [1302.53 Community partnerships and coordination with other early childhood and education programs. | ECLKC \(hhs.gov\)](#)

There are three exceptions to this STAR 4 reciprocity extension. The following HS/EHS locations are **not** eligible to receive STAR 4 reciprocity and will need to follow the Keystone STARS Performance Standards in order to move up in Keystone STARS:

- DHS certified child care sites operated under a HS/EHS grantee in which there are **no** HS/EHS children enrolled and the site is **not** following the Head Start Program Performance Standards (HSPPS).
- DHS certified child care sites who have partnerships with a HS/EHS grantee, including Early Head Start – Child Care Partnership (EHS-CCP), whose DHS certificate of compliance (CoC) is held under the child care provider’s MPI and who is a separate legal entity from the HS/EHS grantee.
- Non-DHS certified HS/EHS grantee locations that are not serving any HS/EHS children and are **not** following HSSPS.

Process for Granting STAR 4 Reciprocity to Eligible HS/EHS Locations Operating Under a HS/EHS Federal Grantee

The following process will be implemented in order to confirm that **all** eligible HS/EHS locations are designated with STAR 4 reciprocity appropriately:

1. Each HS/EHS federal grantee will complete a *Head Start and Early Head Start Location Demographics Spreadsheet*, attached to this policy announcement and also found on the Pennsylvania Key website at www.pakeys.org.
2. Each HS/EHS grantee will return a copy of the completed *Head Start and Early Head Start Location Demographics Spreadsheet* to their ELRC.
3. Upon receipt of the completed *Head Start and Early Head Start Location Demographic Spreadsheet*, the ELRC will ensure that all HS/EHS location information is complete and accurate in PELICAN.
4. The ELRC will use the *Flowchart for Determining Keystone STARS Level: Head Start/Early Head Start with DHS Certified Child Care* to determine whether each location is eligible or ineligible for Head Start STAR 4 reciprocity. The ELRC will then indicate one of the following eligibility determinations for each HS/EHS location on the *Head Start and Early Head Start Location Demographics Spreadsheet*.
 - Eligible for **Head Start STAR 4 Reciprocity**.
 - These locations contain at least one federal and/or state funded child in every classroom, therefore the entire location is subject to monitoring by the Federal Office of Head Start (OHS). These grantees **must** sign Section 1 of the *Keystone STARS Attestation for Head Start and Early Head Start Grantees*.
 - Eligible for **Head Start DHS STAR 4 Reciprocity**. These locations have a DHS Certificate of Compliance and contain at least one classroom that does not serve at least one HS/EHS child and therefore will not be monitored by OHS.

- These locations require further attestation that the HS/EHS grantee follows the HSPPS identified in the *Keystone STARS Attestation for Head Start and Early Head Start Grantees* for all classrooms at the location and **must** sign Section 2 of the Attestation.
 - Ineligible for Head Start STAR 4 Reciprocity as the location does not meet an eligible provider type for Keystone STARS.
- 5. The ELRC will send a copy of the completed *Head Start and Early Head Start Location Demographics Spreadsheet* with reciprocity determinations to each HS/EHS federal grantee in their region along with the *Keystone STARS Attestation for Head Start and Early Head Start Grantees*. The *Attestation* form can also be found on the Pennsylvania Key website at www.pakeys.org.
- 6. Each HS/EHS grantee will review the reciprocity determinations made for their locations by the ELRC on the completed *Head Start and Early Head Start Location Demographic Spreadsheet*. The HS/EHS grantee will contact the ELRC with any questions about reciprocity decisions.
- 7. Each HS/EHS grantee will read and sign the *Keystone STARS Attestation for Head Start and Early Head Start Grantees* if they are requesting to receive Head Start STAR 4 Reciprocity or Head Start DHS STAR 4 Reciprocity for their eligible locations and return a copy of the *Attestation* to their ELRC.
- 8. Following the receipt of the signed *Keystone STARS Attestation for Head Start and Early Head Start Grantees*, ELRC staff will ensure that the information for each location under the HS/EHS grantee is accurate and complete.
- 9. The ELRC will send the appropriate *Keystone STAR 4 Designation Certificates* with one-year expiration dates to the HS/EHS grantees who are responsible to distribute the designation certificates to their respective locations.

The steps outlined above will become part of an annual renewal process to be completed by the ELRC and the HS/EHS federal grantees. During the annual renewal process, the ELRC and HS/EHS grantee(s) will work to ensure continued accuracy of data, location information, and STAR 4 reciprocity determinations. OCDEL will issue future clarifications as needed to communicate any changes in protocol.

In cases in which a HS/EHS federal grantee has locations in more than one ELRC region, the ELRC where the grantee's administrative office is located will take the lead in this process and share information regarding any outlying locations with the other applicable ELRCs.

Updated Attestation Form for HS/EHS Grantees

The Attestation Form for HS and EHS Federal Grantees has been updated to include:

- Section #1 – Attestation statements that must be read and signed off on by the HS/EHS grantees that have locations that contain at least one federal and/or

state funded child in every classroom therefor the entire location is subject to monitoring by the Federal Office of Head Start (OHS).

- Section #2 - Additional attestation statements that must be read and signed off on by any HS/EHS grantee that have a location(s) with a DHS Certificate of Compliance (CoC) that contains at least one classroom that does not serve at least one federally and/or state funded HS/EHS child and therefore would not be subject to monitoring by OHS.
- The attestation statement includes an updated requirement that **all** on-site leadership team members and teaching staff working at HS/EHS locations complete their profile in the Professional Development (PD) Registry to the point at which their Career Pathway by **Oct. 1, 2021**. Moving forward, this requirement **must** be met by any newly hired staff within 60 days of hire. More information including tip sheets for PD Registry profile completion can be found by clicking [here](#).

NEXT STEPS

1. HS and EHS Federal Grantees:
 - Follow the steps outlined in this announcement.
 - Direct any questions to your ELRC or the HSCCO.