



BRIGHT FROM THE START
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MEMORANDUM

To: Head Start Agencies and Private Organizations in Collaboration with Head Start

From: Jackie Romain, Nutrition Services Director *Handwritten: Jackie Romain*

Date: August 14, 2008

Re: Claiming of Head Start Children in Collaborative Arrangements

The memorandum entitled, "Claiming of Head Start Children in Collaborative Arrangements," dated February 26, 2002 has been rescinded. The following includes revised and updated information regarding claiming of Head Start children in collaborative arrangements.

This memorandum is to clarify the procedures regarding claiming of reimbursement for children enrolled in the Head Start program, when the Head Start agency is collaborating with private child care centers or school boards of education (BOE) for space and instructional services. Additional guidance was provided by the United States Department of Agriculture (USDA). According to USDA, it is acceptable for either organization to claim reimbursement as long as the agencies (i.e., the Head Start agency and the childcare center, or the Head Start Agency and the school board of education) are in agreement as to whom will claim reimbursement under the Child and Adult Care Food Program for those children enrolled simultaneously in the Head Start Program administered by the U.S. Department of Health and Human Services and the private childcare center. Upon initial agreement, agencies should determine who will claim reimbursement under the Child and Adult Care Food Program (CACFP). The agreement between the agencies should specify this arrangement.

Head Start centers who claim reimbursement for children housed in private child care centers or school boards of education will include the site in their program application with Bright from the Start and must contract for meal preparation and service using proper procurement guidelines. This means that the Head Start agency may not automatically contract with the private center or school board of education in which the children are housed, but must follow proper procurement guidelines in procuring the contract. Please refer to 7 CFR Parts 3015, 3016, or 3019 and Bright from the

Start's Procurement Manual for Federally Funded Programs for information concerning procurement guidelines for non-profit entities. All records to verify the claim for reimbursement, to include the Daily Menu and Food Service Records, must be maintained by the Head Start agency with other program records.

Where the Head Start and the private child care center or school board of education agree that the private child care center or school board of education will claim for reimbursement, the private child care center or school board of education will include the Head Start children as a part of the total enrollment in the organization and include these children in the initial roster submitted in the CACFP application. All children, including Head Start children, must have documentation of enrollment records on file at the center. If the private child care center is a For Profit entity, the center must qualify for the CACFP based on either Title XX or Free and Reduced Price Meal eligibility. Head Start program participants would be included in the total enrollment in making the eligibility determination.

As indicated in the CACFP policy memorandum issued by Bright from the Start dated July 1, 2008, "Automatic Eligibility for Head Start Participants," eligibility for free meals benefits, including free milk, has been extended to all children enrolled in Head Start. In the past, only those children who were income eligible for Head Start were considered automatically eligible for free meals in the child nutrition program. Public Law 110-134 makes any child enrolled in Head Start automatically eligible for free meals without further application or eligibility determination.

CACFP's Income Eligibility Statements (IES) are no longer required to determine eligibility of Head Start children. Acceptable documentation for participants includes: (1) an approved Head Start application; (2) a statement of Head Start enrollment; or (3) a list of participants from a Head Start official. This process also applies to Early Head Start children (see also CACFP policy memo, "Automatic Eligibility for Early Head Start Participants," dated August 14, 2008).

Although the IES is no longer required, institutions may continue to use the form as an enrollment tool to document Head Start children in addition to one of the three acceptable forms of documentation previously mentioned. When using the IES to document enrollment, the following sections must be completed:

- Section 1
- Section 2A (Head Start check box)
- Section 3A (Enrollment Information)
- Section 3B (Name, Address, Contact Information, Signature and Date)

The IES has been updated to reflect Head Start enrollees. Copies of the IES may be obtained from Bright from the Start's web site: www.decal.state.ga.us.

For questions concerning this memorandum, please contact Sonja R. Adams, Policy Administrator, at (404) 651-8193.