



STRATEGIC USE OF CONSULTANTS

Activity 1: Setting the Context

Head Start Act and Head Start Program Performance Standards

Head Start Act

On December 12, 2007, Public Law 110-134, “Improving Head Start for School Readiness Act of 2007,” reauthorized the Head Start program. This law contained significant revisions in the area of program governance and the composition of the governing body. The following excerpt describes how the governing body shall use consultants when the prescribed experts are not available to serve as regular members of the governing body:

Sec. 642 (c) (1) (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.

(iii) Not less than 1 member shall be a licensed attorney familiar with issues that come before the governing body.

(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 an other individual with relevant expertise, with the qualifications described in that clause, who shall work directly with the governing body.

Head Start Program Performance Standards

Section 45 CFR §1302.90 of the *Head Start Program Performance Standards* focuses on human resources management.

45 CFR §1302.90, *Standards of conduct*, provides important information for Head Start leaders engaged in hiring and overseeing consultants who provide long-term and short-term T/TA services:

Sec. 1302.90(c) *Standards of conduct*.

(c) Standards of conduct. (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.

45 CFR 1302.91 *Staff qualifications and competency requirements*, includes requirements that all consultants have appropriate knowledge, training, expertise, and experience to provide the services for which they were hired.

45 CFR 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.



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