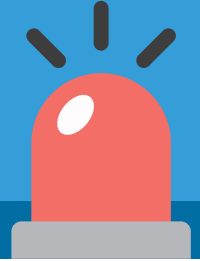




New Head Start Guidance on Reporting Child Health and Safety Incidents



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In a recent Information Memorandum ([ACF-IM-HS-22-07](#), “the IM”), the Office of Head Start (OHS) clarifies when and how Head Start programs should report child health and safety incidents to OHS. The Head Start Program Performance Standards, [45 CFR § 1302.102\(d\)\(1\)\(ii\)](#), require Head Start programs to “submit reports, as appropriate, to the responsible U.S. Department of Health and Human Services (HHS) official immediately or as soon as practicable, related to any significant incidents affecting the health and safety of program participants.” The long-standing challenge for many grantees has been determining what constitutes a “significant incident affecting the health and safety of children”. In the IM, OHS explains that it considers a “significant incident” to be any incident that results in serious injury or harm to a child, violates Head Start standards of conduct at [45 CFR §1302.90\(c\)](#), or results in a child being left alone, unsupervised, or released to an unauthorized adult. **This includes incidents involving Head Start staff, contractors, or volunteers in a blended classroom, even if the affected child(ren) is not Head Start-eligible or funded by Head Start.** The IM acknowledges that it is not possible to provide an exhaustive list of significant incidents and provides examples.

The IM also outlines the consequences for failure to report during the given timeframe. When a significant incident occurs in a Head Start program, the grantee must report the incident to their program specialist or regional program manager no later than seven calendar days following the incident. Head Start programs should not wait for adjudication through local, state, or tribal officials before reporting a significant incident to OHS. The program should also report the incident to local, state, or tribal entities as required by applicable laws.

While the IM provides helpful guidance on what constitutes a significant incident, it is important for Head Start grantees to remember that they have some discretion when determining whether to report an occurrence to OHS. In 2018, OHS issued a letter to grantees noting an increase in reports of child health and safety incidents and reminding grantees that they are not required to report “minor”, “insignificant incidents” that do not harm or endanger children. OHS encouraged grantees to work with management, governing bodies, Health Advisory Committees, mental health consultants, and local or state licensing agencies to develop guidelines for what constitute reportable practices or behaviors. The letter noted that programs should not automatically terminate staff involved in those violations. Note that the DRS system was revised in 2019 to eliminate the single deficiency trigger. This should reduce grantee anxiety around being automatically placed into recompetition because of a single health and safety incident.

To read the full text of the IM, click [here](#).

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