

Head Start Guidance on Child Abuse Reporting and Supervision

*By Veronica Zhang, Esq.
October 2015*

On September 18, 2015, the Office of Head Start (OHS) released two Information Memoranda (IMs) addressing program issues that Head Start grantees commonly face.

[ACF-IM-HS-15-04: Mandated Reporting of Child Abuse and Neglect](#) discusses reporting suspected child abuse or neglect to the appropriate state child protection agency where there is a reasonable suspicion that such abuse or neglect has occurred or there is a substantial risk that it may occur, either in the care of a Head Start agency or outside of the program. The IM emphasizes that programs and individuals must not attempt to investigate whether abuse or neglect actually occurred because doing so can jeopardize the accuracy of the official investigation conducted by child protective services. Rather, the IM states that Head Start programs must have internal procedures in place for staff to report suspected cases of child abuse and neglect to the program's Regional Office, which procedures "should also include notification to the program's Regional Office immediately when a staff member or volunteer causes an incident or suspected incident." Programs should also train employees and volunteers to

identify signs of abuse and neglect and must remove any employee who is the subject of a reported case of abuse or neglect from contact with children during the state investigation and until the charge is fully resolved. Note that the OHS abuse and neglect reporting and investigation standards set forth in the IM may vary from the applicable requirements under individual state laws, so Head Start grantees should also be sure to check the procedures required in their states.

[ACF-IM-HS-15-05: Supervision and Transitions](#) discusses a variety of strategies to help Head Start grantees ensure that children are not left unsupervised at a Head Start program, on playgrounds, or on buses. The IM also addresses reporting incidents of unsupervised children and OHS's role in the investigation process. According to the IM, "programs should report incidents of unsupervised children to the Regional Office of Head Start within three days of the incident, including, where applicable, any reports made or information shared with child welfare agencies, state licensing bodies, and parents." The program's Regional Office will document the incident, including any investigations or other actions



taken in response to the report, and will provide technical assistance to the program as needed. The 2016 OHS Environmental Health & Safety (EnvHS) Protocol also asks whether a child has been left unsupervised during the past 12 months and whether the Head Start grantee reported the incident to the Regional Office of Head Start. [2016 OHS EnvHS Protocol 3.5](#). OHS recommends that each Head Start program develop and communicate an agency-wide supervision plan addressing active supervision, including strategies and action steps for managing transitions throughout the day.

