

ELIGIBILITY

History

Since the beginning of state-funded preschool in Michigan, the intent has been to provide high-quality services to children at risk for low educational attainment and to build upon the already existing federally-funded Head Start programs.

In 1988, the Michigan State Board of Education adopted a report entitled 'Children at Risk: An Examination of Causes; An Exploration of Alternatives.' The well-known 25 risk factors that were originally in use came from that report. Local programs were required to use the risk factors in determining eligibility and were encouraged to develop prioritized eligibility using the risk factors based on the needs of their communities.

In 2008, the legislatively mandated Great Start Readiness Program (GSRP) Biennial Legislative Review Committee met and reviewed risk factor data, which resulted in a recommendation that the Michigan Department of Education (MDE) re-examine the risk factors in light of the research done over the past 20 years. Therefore, MDE formed an ad-hoc committee and began the process in January 2009 by convening a group of stakeholders to review and revise the risk factors. The result of their work was a report to the Michigan State Board of Education that consolidated and updated the risk factors for eligibility as well as defined a statewide prioritization process for recruitment and enrollment. The Michigan State Board of Education adopted the report on May 12, 2009.

There are eight consolidated risk factors. Based on the prevalence data, family income continues to be the most utilized factor in determining eligibility for GSRP. It was determined that tiered income eligibility was needed to ensure GSRP is finding and providing services to its target population and focusing on those most at risk. Therefore, family income has been split from one factor into two factors. Extremely low family income is defined as below 200 percent of the federal poverty level and low family income is defined as between 200 to 300 percent of the federal poverty level. In addition, as part of the prioritization process, at least 75 percent of children must be identified with one of these two factors.

The eight risk factors used to determine GSRP eligibility are:

1. Extremely low family income
2. Low family income
3. Diagnosed disability or identified developmental delay
4. Severe or challenging behavior
5. Primary home language other than English
6. Parent(s) with low educational attainment
7. Abuse/neglect of child or parent
8. Environmental risk

Prioritization

Grantees are required to implement a specific prioritization process of risk factors in the recruitment and enrollment process. When deciding whether a situation or condition should be considered, the most important question to ask is whether and how the situation puts the child at risk of school failure and how the risk factor will have a negative impact on the child's development. If the situation or condition is not something that puts the child's educational future at risk, then it is not a risk factor for that child.

Any child from a family with extremely low income, regardless of the existence of additional risk factors, will receive top priority for enrollment, and may be enrolled with this risk factor alone. Next to be considered for enrollment are children with low family income and two additional risk factors - for a total of three risk factors. This is followed by children with low family income and one additional risk factor. Finally, children of families with incomes above 300 percent of the federal poverty level who have two additional risk factors are considered lowest priority for enrollment in GSRP.

One additional provision that applies to the prioritization of risk factors is less than 25 percent of enrolled children may be made eligible for GSRP under the 4th level of prioritization. That is, at least 75 percent of children must qualify under the extremely low and low family income criteria.

Collaborative recruitment and enrollment processes between local GSRP programs and Head Start is legislatively mandated. Written procedures should include processes for monthly monitoring of funded enrollment and apparent reasons for unfilled slots should be addressed by the administrative team. Refer to the Recruitment and Enrollment section) for further clarification.

Sensitive Interviewing

Most programs use a brief phone interview format to initially screen children to determine whether they might be eligible. A family that seems to have an at-risk child should be invited for a more in-depth interview. Giving parents a list of questions or factors to fill out on their own is not recommended; many are confidential and can be uncomfortable to address. Sensitive interviewing techniques often result in helpful information about providing appropriate services for children and families. Appropriate documentation of risk factors should be identified at the interview. Documentation should be provided before the child is enrolled. Both the interviewer and the parent must sign and date a form indicating which risk factors pertain when the interview concludes. This serves as documentation of any risk factors for which "parent report" is acceptable. Other factors can be added later by staff (initialed and dated). MDE collects risk factor information on each enrolled child at the time of the Child Information and Program Evaluation Report (CiPER), formerly the Mid-Year Report; and documentation is reviewed during On-Site Monitoring Visits.

Risk Factors

It is recommended that programs record all risk factors for each child at the time of enrollment; additional risk factors that staff become aware of beyond the enrollment period should also be recorded. The documentation may be helpful in designing program services for children.

In general, the same condition or concern should not be counted twice; e.g., a child with severe or challenging behavior should not also be considered as having a developmental delay in the social/emotional domain. Additionally, more than one situation under environmental risk may apply to a child and should be documented; however, environmental risk may be counted as only one risk factor. When "parent report" can be used as documentation, a note should be included in the file with the staff member's signature and date indicating WHAT the parent reported; e.g., to document parent report of low educational attainment, the following should be noted:

*8/12/10 - At the intake interview, Ms. Brown reported that she has a GED and the child's father has not graduated from high school.
Julie Smith, Lead Teacher*

The chart, Risk Factor Definitions, found in the resources for this section will help to further define each of the risk factors and suggest possible ways to document them.

Income

Income for each family must be verified before determining that a child is eligible to participate in the program. Although use of the Eligibility Verification form, found in the resources for this section, is not required, MDE strongly encourages programs to use it. Grantees should provide annual training to employees responsible for determining and verifying income eligibility. Grantees are not required to maintain copies of the documents reviewed to determine income eligibility; however, MDE encourages grantees to maintain copies of all eligibility documents along with the eligibility verification form in the child's official record.

A family includes all persons related by blood, marriage, or adoption, living within a household who are supported by the income of the parent or guardian of the child enrolling or participating in the program. A parent who is not living in the prospective child's home and is not likely to return to that home anytime in the near future (i.e., during the child's participation in GSRP) should not, however, be included when determining family size (with the exception of a deployed parent). Grantees must make individual judgments about whether the absent parent is truly part of the child's family or not and to document, in the child's file, the decision and the reasons for that decision.

For parents who have joint custody, the total number of family members for both families are summed and then divided in half, rounding up when necessary. For example, if both custodial parents have remarried and each has a child from this marriage, the family size is 2 custodial parents + 2 spouses + 2 children + GSRP child = 7; divided by 2 = 3.5, or rounding up, 4. If one parent is paying any child support to the other parent, the income of the parent receiving the child support should be used for determining income eligibility. If neither parent is providing any child support to the other, the grantee should count half of each parent's income and the sum of these two should be used by the program in determining income.

At least 75 percent of the children enrolling into the program must have parent(s) who can document income below 300 percent of the Federal Poverty Level (FPL). Income is defined as gross cash income for all persons having legal responsibility for the child and includes earned income, military income, veteran's benefits, social security benefits, unemployment compensation, child support payments and public assistance benefits. The Income Eligibility Guidelines can be accessed on the GSRP website.

Grantees may consider the income:

- of the last 12 months,
- of the preceding calendar year, or
- at the time of enrollment.

For example, if neither the last 12 months or the preceding calendar year accurately represents the family's situation at the time of enrollment (e.g., because the parent is recently unemployed) then the GSRP grantee should use its judgment in deciding if it seems likely that the current situation more accurately reflects a family's likely economic status during the period of the child's enrollment.

If a family claims it has no income, the family is income-eligible for Head Start and must be referred to that agency. If the family is unable to provide income documentation, the grantee must determine the accuracy of the verbal report of income. Grantees can gather

information (i.e., living arrangements, assets, etc.) to make an informed judgment about the family's income status.

If a parent is an active member of the U.S. Armed Forces, certain pay can be excluded from family gross cash income <http://www.irs.gov/publications/p3/ar02.html#d0e1259>. Please be aware that an adjusted family income may make the family income-eligible for Head Start, and in that case, must be referred to Head Start. The following are NOT included as gross cash income for active duty U.S. Armed Forces personnel:

- Living Allowances – Basic Allowance for Housing (BAH) even if BAH is used to pay mortgage interest and taxes, Basic Allowance for Subsistence (BAS), housing and cost of living allowances abroad, Overseas Housing Allowance (OHA).
- Moving Allowances – moving household and personal items, storage, moving trailers or mobile homes, temporary lodging, dislocation, military base realignment, and closure benefit.
- Travel Allowances – annual roundtrip for dependent students, leave between consecutive overseas tours, reassignment in a dependent restricted status, transportation during ship overhaul and inactivation, per diem.
- Family Allowances – specified educational expenses for dependents, emergencies, evacuation to a place of safety, separation.
- Death Allowances - burial services, death gratuity payments to eligible survivors, travel of dependents to burial site.
- In-kind Benefits – dependent-care assistance, legal assistance, medical/dental care, commissary/exchange discounts, space-available travel on government carriers.
- Other payments – disability, group-term life insurance, professional education, ROTC educational and subsistence allowances, uniform allowances, survivor and retirement protection plan premiums.

The best documentation of income is a copy of the most recent tax return. Alternate forms of documentation are paycheck stubs (indicate pay period: bi-weekly, weekly, etc.), W-2 forms, written statements from employers, or documentation showing current status as recipients of public assistance. The program's documentation verifying the income calculation must be signed by the staff member and retained in the child's file.