

ERSEA: Violations

Eligibility, Recruitment, Selection, Enrollment, Attendance (ERSEA)



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Head Start Program Performance Standards

45 CFR Chapter XIII
September 2016

U.S. Department of Health and Human Services
Administration for Children and Families
Office of Head Start



Violations

§ 1302.12(I) Violations

Written policies and procedures on violating eligibility determination regulations.

Describe all actions taken against staff who intentionally violate federal and program eligibility determination regulations and enroll those not eligible to receive EHS/HS services.



GAO-19-519

- Released 10/02/2019
- This report discusses
- What vulnerabilities GAO's covert tests identified in selected Head Start grantees' controls for program eligibility screening;
- The extent to which OHS provides timely monitoring of grantees; and
- What control vulnerabilities exist in OHS's methods for ensuring grantees provide services for all children and pregnant women they are funded to serve



GAO: Undercover GAO Agent attempting to enroll into the Head Start program - Au... [Share](#)

**Undercover GAO Special Agent
attempting to enroll into the Head Start program**

GAO-19-519
Audio Recording #1

MORE VIDEOS

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FAST FACTS

HIGHLIGHTS

RECOMMENDATIONS

FULL REPORT (HTML) 

The Head Start program helps children from low-income families get ready to attend school. We attempted to enroll fictitious children in 15 Head Start centers using information that should have disqualified our applications, such as pay stubs that exceeded income requirements. We found:

- Potential fraud at 5 centers. For example, in 3 cases, we retrieved our applications and found they had been doctored to exclude disqualifying information
- 3 centers encouraged our attendance without following verification requirements
- 7 centers correctly determined our ineligibility

We made **6 recommendations**, including that Head Start assess fraud risk.

What GAO Found

GAO's 15 covert tests at a nongeneralizable selection of Head Start grantee centers found vulnerabilities in centers' controls for eligibility screening and detecting potential fraud.

Posing as fictitious families, GAO attempted to enroll children at selected Head Start centers in metropolitan areas (e.g., Los Angeles and Boston).

What GAO Found

In 7 of 15 covert tests, the Head Start centers correctly determined GAO's fictitious families were not eligible.

In another 3 of 15 covert tests, GAO identified control vulnerabilities, as Head Start center staff encouraged GAO's fictitious families to attend without following all eligibility-verification requirements.



What GAO Found

In the remaining 5 of 15 covert tests, GAO found potential fraud. In 3 cases, documents GAO later retrieved from the Head Start centers showed that GAO's applications had been doctored to exclude income information GAO provided, which would have shown the fictitious family to be over-income. In 2 cases, Head Start center staff dismissed eligibility documentation GAO's fictitious family offered during the enrollment interview.

What GAO Found

Office of Head Start (OHS), within the Department of Health and Human Services, has not conducted a comprehensive fraud risk assessment of the Head Start program in accordance with leading practices. Such an assessment could help OHS better identify and address the fraud risk vulnerabilities GAO identified.

What GAO Found

OHS has not always provided timely monitoring of grantees, leading to delays in ensuring grantee deficiencies are resolved.

In the period GAO examined, OHS did not consistently meet each of its three timeliness goals for

- (1) notifying grantees of deficiencies identified during its monitoring reviews,
- (2) confirming grantee deficiencies were resolved, and
- (3) issuing a final follow-up report to the grantee.

What GAO Found

In October 2018, OHS implemented new guidance (called “workflows”) that documents its process for notifying, following up, and issuing final reports on deficiencies identified by its monitoring reviews. However, OHS has not established a means to measure performance or evaluate the results of its new workflows to determine their effectiveness.



What GAO Found

For each test, GAO provided incomplete or potentially disqualifying information during the enrollment process, such as pay stubs that exceeded income requirements.

Vulnerabilities exist for ensuring grantees provide services to all children and pregnant women they are funded to serve.

What GAO Found

For example, OHS officials said grantees have the discretion to allow children with extended absences—sometimes of a month or more, according to GAO’s analysis—to remain counted as enrolled.

OHS officials told GAO that a child’s slot should be considered vacant after 30 days of consecutive absences, but OHS has not provided that guidance to grantees.



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Thank You!