



JEFFERSON PARISH
DEPARTMENT OF THE PARISH ATTORNEY

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JOHN F. YOUNG, JR.

PARISH PRESIDENT

Via EMAIL & U.S. MAIL

Ms. Jennifer M. Coco
Staff Attorney
Southern Poverty Law Center
1055 St. Charles Avenue, Suite 505
New Orleans, Louisiana 70130

Re: **JEFFCAP Head Start**

Dear Ms. Coco:

This is in furtherance of our recent communications regarding the Head Start Program and I believe that we agree the concerns raised in your May 16 letter may be amicably resolved as a result of our meeting and discussion on June 4, 2013. As we informed during the June 4 meeting, enrollment is still open for the 2013-2014 program year; the selection phase of the registration and enrollment process has not yet begun. Therefore, if there are any individuals or families who wish to register, they may contact the program office at: (504) 838-1003. With respect to the two (2) individuals (your clients) that we discussed in our meeting, our understanding is that these individuals were present at the on-site registration event at the community center and asked to return with proper documents. Our understanding is that these individuals had to leave the registration site in order to get the requested documents (and in one instance to return with an adult family member) but were concerned about having lost their places in line. As Ms. Rabathaly explained, the numbering system used during on-site registration has no bearing on eligibility or selection. Therefore, please be assured there will be no adverse impact on the eligibility assessment for these families based on their experiences, as related by you, during the on-site registration event at the community center. My understanding is that both of your clients have successfully registered applications, which are pending, and that both families will be duly notified once the selection phase is complete.

As you are aware, the Parish took immediate steps to investigate the issues raised in your letter, to immediately discontinue the use of the registration flyer, and to meet with you for the opportunity to exchange information and to address your concerns regarding the registration process. Although it is **not** our understanding that the program policy and/or practice has engaged in any illegal practices relative to the registration/enrollment process, the Parish agrees to review and revise, as necessary, its policy and practice so that eligibility criteria is communicated clearly to all applicants and to ensure the application process is accessible to all and that the program is administered fairly and in accord with federal, state and local law.

DEBORAH CUNNINGHAM FOSHEE
PARISH ATTORNEY

E. ROSS BUCKLEY, JR.
DEPUTY PARISH ATTORNEY

EDWARD S. RAPIER, JR.
DEPUTY PARISH ATTORNEY

The JEFFCAP Head Start program is taking the following additional actions:

Flyers/Announcements: Again, the use of the registration flyer attached to your May 16 letter has been discontinued. All flyers and other public communications related to program applications, registration and/or enrollment will be reviewed and revised so that eligibility criteria are set forth clearly and in accord with federal regulations. Although there are some limitations to the total number of children the program may accommodate, enrollment applications may be submitted and will be accepted from all applicants. Eligibility is determined only by the child's age, current residency in Jefferson Parish, and family size and income. The Parish will revise its communications, as needed, to clarify that proof of U.S. citizenship is not one of the eligibility criteria; therefore, documents such as a LA drivers' license/identification and/or Social Security card or proof of same will not be solicited as **required** documents for the purposes of registration. Instead, the program would consider alternative forms of documentation to establish the age, income and residency criteria for enrollment.

Technical Assistance/Training: The department will continue to consult with its Regional Office representative (DHHS) regarding its registration/enrollment policy and practice, to seek technical assistance as needed and to utilize additional resources to ensure that all policy and practice comports with national standards, local, state and federal law. The department will seek additional and specific guidance from the Regional Office regarding what documents are requested and/or required of applicants prior to its final determination and/or publication of registration/enrollment criteria for future program years. The department is also committed, as explained in our June 4 meeting, to providing enhanced training and professional development to program staff so that all staff are informed and instructed properly on eligibility criteria and specifically, documents that may be accepted for program applications. The program intends to develop and conduct a mandatory staff training session(s) during the summer months of 2013 and prior to the school year; the training will include addressing the differences between necessary documents/materials versus alternative documents/materials that may be produced to meet eligibility criteria for applications and enrollment; and, include instruction that all applications shall be accepted for consideration – no application shall be rejected for lack of a particular document and/or form of identification and/or proof of identity, residency or income.

Finally, as related in the June 4 meeting, the department would consider the interview you proposed with Telemundo, or in the alternative, a press release, to clarify the application and enrollment process. As promised, Mr. Jackson has, in fact, forwarded this request to the attention of our public information officer.

Thank you for your time, consideration and professional courtesies. It is my sincere hope that your clients' needs have been adequately addressed and your concerns satisfactorily

resolved. Please contact me should have additional concerns and/or wish to further discuss same.

Sincerely,



Christine D. Thomas
Senior Assistant Parish Attorney

cc: R. Rabathaly, Administrator, Head Start
J. Jackson, Director, JEFFCAP
D. Ward, CAA
E. Ross Buckley, Jr., Deputy Parish Attorney
Deborah C. Foshee, Parish Attorney
Shannon Hills, HHS – Head Start Program Specialist
Kimberly Chalk, HHS – Head Start Regional Program Manager