



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of Head Start | 4th floor Switzer Memorial Building, 330 C Street SW, Washington DC | eclkc.ohs.acf.hhs.gov

To: Board Chairperson

*Mr. Warner Roach
Board Chairperson
Lima Allen Council on Community Affairs
540 South Central Avenue
Lima, OH 45804-1306*

From: Responsible HHS Official

*Dr. Blanca Enriquez
Director, Office of Head Start*

Blanca E. Enriquez 6/24/16
Date

Overview of Findings

From 3/22/2016 to 3/23/2016, the Administration for Children and Families (ACF) conducted a Leadership/Governance/Management Systems review event for the Lima Allen Council on Community Affairs Head Start and Early Head Start programs. We wish to thank the governing body, Policy Council, staff, and parents of your program for their cooperation and assistance during the review event. This Head Start Review Event Report has been issued to Mr. Warner Roach, Board Chairperson, as legal notice to your agency of the results of the on-site review event.

Based on the information gathered during this review event, your Head Start and Early Head Start programs were found to be out of compliance with one or more applicable Head Start Program Performance Standards, laws, regulations, and policy requirements. The report provides you with detailed information in each area where program performance did not meet applicable Head Start Program Performance Standards, laws, regulations, and policy requirements. Each area of noncompliance identified in this report should be corrected within 120 days following receipt of this report.

Please contact your ACF Regional Office with any questions or concerns you may have about this report.

Distribution of the Head Start Review Report

Copies of this report will be distributed to the following recipients:

Ms. Kay Willmoth, Regional Program Manager
Ms. Hope Weis, Policy Council Chairperson
Ms. Jacqueline Fox, CEO/Executive Director
Ms. Phyllis Montrose, Head Start Director

Overview Information

Review Type:	GovSys
Organization:	Lima Allen Council on Community Affairs
Program Type:	Head Start and Early Head Start
Field Lead:	Ms. Sharon Benson
Funded Enrollment HS:	371
Funded Enrollment EHS:	130

Glossary

A glossary of terms has been included to explain the various terms used throughout this report.

Term	Definition
Compliance Measure (CM)	The specific statements that collectively assess the level of program performance for each Key Indicator, focusing on one or more Federal regulations critical to the delivery of quality services and the development of strong management systems.
Strength	A new and/or unique way of reaching the community.
Compliant	No findings. Meets requirements of Compliance Measure.
Concern	An area or areas of performance which need improvement or technical assistance. These items should be discussed with the Regional Office and do not include a timeframe for correction.
Noncompliance	A finding that indicates the agency is out of compliance with Federal requirements (including, but not limited to, the Head Start Act or one or more of the performance standards) in an area or areas of program performance, but does not constitute a deficiency. Noncompliances require a written timeline of correction and possible technical assistance (TA) or guidance from their program specialist, and if not corrected within the specified timeline, can become a deficiency.
Deficiency	<p>An area or areas of performance in which an Early Head Start or Head Start grantee agency is not in compliance with State or Federal requirements (including but not limited to, the Head Start Act or one or more of the regulations) and which involves:</p> <p>(A) A threat to the health, safety, or civil rights of children or staff;</p> <p>(B) A denial to parents of the exercise of their full roles and responsibilities related to program governance;</p> <p>(C) A failure to perform substantially the requirements related to Early Childhood Development and Health Services, Family and Community Partnerships, or Program Design and Management; or</p> <p>(D) The misuse of Head Start grant funds.</p> <p>(ii) The loss of legal status or financial viability, as defined in part 1302 of this title, loss of permits, debarment from receiving Federal grants or contracts or the improper use of Federal funds; or</p> <p>(iii) Any other violation of Federal or State requirements including, but not limited to, the Head Start Act or one or more of the performance standards of this title, and which the grantee has shown an unwillingness or inability to correct within the period specified by the responsible HHS official, of which the responsible HHS official has given the grantee written notice pursuant to section 1304.61.</p>

Summary of Findings

Finding Type	Applicable Standards	Program Type	Grant	Timeframe	Compliance Level
<i>Operating and Implementing the Program</i>	1304.51(g)	HS and EHS	05CH8353	120 days	Noncompliance
<i>Evaluating Performance and Stimulating Ongoing Improvement</i>	644(a)(2)(B)	HS and EHS	05CH8353	N/A	Concern

Leadership, Governance & Management Systems

CM#	Compliance Measure	Compliance Level
LGMS 1.1	<p>The program's planning process:</p> <ul style="list-style-type: none"> • Is based on a mission (philosophy) that aligns with the priorities of the Office of Head Start and the community's needs • Includes development of long term goals and short term objectives based on program data • Involves stakeholders (governing bodies, policy groups, parents, and staff) • Includes plans to guide the program in achieving its goals and in delivering high quality services and ensuring the health and safety of Head Start facilities and learning environments. 	<p>Compliant</p> <p>1304.51(a)(1), 1304.51(a)(1)(i-iii)</p>
LGMS 2.1	<p>The program recruits, hires and trains qualified staff to maintain an organizational structure that supports the program in providing high quality services to children and families, ensuring their health and safety, and ensuring the achievement of program goals.</p>	<p>Compliant</p> <p>1304.52(a)(1), 1304.52(a)(2)(i-iii), 642(c)(1)(E)(iv)(IX), 642(c)(1)(E)(iv)(V)(cc)</p>
LGMS 2.2	<p>The governing body exercises fiscal oversight to ensure the program has the resources it needs to deliver comprehensive services, ensure healthy and safe environments, and accomplish its goals.</p>	<p>Compliant</p> <p>642(c)(1)(E)(iv)(VII)(aa-bb)</p>
LGMS 2.3	<p>The grantee engages its governing body and establishes and uses a Policy Council to provide direction and support for the program in accomplishing its goals and providing high-quality comprehensive services.</p>	<p>Compliant</p> <p>642(c)(1)(B)(i-iv), 642(c)(1)(E)(iv)(VI), 642(c)(2)(A), 642(c)(2)(D)(i-ii, iv, vi)</p>
LGMS 3.1	<p>The program ensures staff are supported and supervised in fulfilling their roles and responsibilities in order to deliver quality services, ensure safe environments and healthy program practices, and achieve program goals.</p>	<p>Compliant</p> <p>1304.52(a)(1)</p>
LGMS 3.2	<p>The program has methods of communication in place that provide:</p> <ul style="list-style-type: none"> • Sharing of accurate and timely information with staff to support them in delivering services to children and families and ensuring the health and safety of the program's environments • Sharing of accurate and timely information with parents, policy groups, and the general community to inform and engage stakeholders 	<p>Compliant</p> <p>1304.51(b)</p>
LGMS 3.3	<p>PART 1304 - Program Performance Standards For Operation Of Head Start Programs By Grantees And Delegate Agencies 1304.51 Management Systems and Procedures. (g) Record-keeping systems. Grantee and delegate agencies must establish and maintain efficient and effective record-keeping systems to provide accurate and</p>	<p>Noncompliance</p> <p>1304.51(g)</p>

timely information regarding children, families, and staff and must ensure appropriate confidentiality of this information.

GovSys (3/22/2016)

The grantee did not ensure its system for record-keeping and reporting strongly supported the delivery of services to children and families. Although the program's Self-Assessment identified issues with its record-keeping system, adequate corrective action was not taken to address the weaknesses.

An effective record-keeping-and-reporting system is critical in ensuring timely information is available to inform service delivery and ongoing program improvement.

A review of the program's 2014-15 Self-Assessment found it identified the program's Health services tracking-and-follow-up process as an area of weakness and concern and called for all management staff to use ChildPlus to increase the consistency and integrity of the program's data. The program subsequently established goals and a process for using data to inform program improvements. However, although staff were transitioning from manual data-tracking processes--such as notebooks--to using the electronic data-tracking system, they did not yet fully adopt the new practices.

The Director stated ChildPlus was the program's main data-tracking system; however, she and the management staff still did not consistently use it. The Director and Board members identified the inconsistencies as the cause of continued issues related to timely, accurate, and effective use of data. The program confirmed its system for collecting, recording, and tracking data needed improvement, and the grantee was in the planning process to address the issue.

The grantee did not establish and maintain efficient and effective record-keeping systems to provide accurate and timely information regarding children, families, and staff; therefore, it was not in compliance with the regulation.

Timeframe for correction: 120 days

LGMS 4.1	<p>The program established and implements procedures for the ongoing monitoring of its operations and services to ensure compliance, the provision of quality, comprehensive services, and safe and healthy environments for children and their families.</p> <p>The program:</p> <ul style="list-style-type: none"> • Uses effective tools and procedures to ensure the program is in compliance, meets its goals, provides comprehensive services that meet community needs, and maintains safe environments • Conducts frequent, ongoing monitoring activities • Collects and uses data for planning activities • Ensures ongoing monitoring takes place in delegate agencies 	<p>Compliant</p> <p>641A(g)(3)</p>
LGMS 4.2	<p>Through the Self-Assessment, the program aggregates and analyzes program data on progress in meeting program goals and objectives.</p>	<p>Compliant</p> <p>641A(g)(1)</p>
LGMS 4.3	<p>The program develops an improvement plan which modifies the action plan and/or objectives based on an analysis of program data.</p>	<p>Compliant</p> <p>641A(g)(2)(B)</p>
LGMS 4.4	<p>Governing body and Policy Council members regularly receive reports and make decisions to support the ongoing monitoring and evaluation of the program.</p>	<p>Compliant</p> <p>642(c)(1)(E)(iv)(V)(aa-bb), 642(c)(1)(E)(iv)(VII)(cc-dd), 642(c)(1)(E)(iv)(VIII), 642(d)(2)(A-I)</p>
LGMS 4.5	<p>The program communicates updates and progress to the public in an Annual Report that contains:</p>	<p>Concern</p> <p>644(a)(2)(B)</p>

- An explanation of the budgetary expenditures and proposed budget for the Fiscal year
- An explanation of the program's efforts to prepare children for kindergarten

The grantee published an Annual Report to the Public; however, the most current version on the website was for 2013, and the copy of the 2014 Annual Report provided for review did not contain an explanation of the grantee's budgetary expenditures or the proposed budget for the fiscal year.

An Annual Report was published by the Lima Allen Council on Community Affairs (LACCA), with which Head Start and Early Head Start were connected. The LACCA budget was included in the report, but the Head Start budget was not exclusive or evident in the full LACCA budget. The Annual Report was available to the Board and the Policy Council, and the 2015 Annual Report was to be completed by May 2016 and published on the LACCA website by then.

— END OF REPORT —