



ADMINISTRATION FOR  
**CHILDREN & FAMILIES**

Office of Head Start | 4th Floor – Switzer Memorial Building, 330 C Street SW, Washington DC 20024 [eclkc.ohs.acf.hhs.gov](http://eclkc.ohs.acf.hhs.gov)

## Program Performance Summary Report

**To: Authorizing Official/Board Chairperson**

*Mrs. Sandy Carlson*

*Clay County Child Care Center*

*314 Court Street*

*Clay Center, KS 67432 - 2420*

**From: Responsible HHS Official**

**Date: 07/12/2022**

**Katie Hamm**

**Acting Director, Office of Head Start**

From June 1, 2022 to June 7, 2022, the Administration for Children and Families (ACF) conducted a monitoring review of Clay County Child Care Center Head Start and Early Head Start programs to determine whether the previously identified findings had been corrected. The Office of Head Start (OHS) would like to thank your governing body, policy council, staff, and parents of your program for their cooperation and assistance during the review. This monitoring report has been issued to Mrs. Sandy Carlson, Authorizing Official/Board Chair, as legal notice to your agency of the results of the program review.

Based on the information gathered during this review, we have closed the previously identified findings which are included in this report. For any previous findings that are not included in this report and remain open, the recipient will receive a future follow-up review to determine the compliance status of those findings.

Please contact your Regional Office for guidance should you have any questions or concerns.

### **DISTRIBUTION OF THE REPORT**

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

Mr. Clarence Small, Regional Program Manager

Mrs. Lisa Stonehouse, Chief Executive Officer/Executive Director

Mrs. Lisa Stonehouse, Head Start Director

Ms. Deb McNeil, Early Head Start Director

## Glossary of Terms

<b>Compliant</b>	No findings. Meets requirements of Head Start Program Performance Standard.
<b>Area of Concern</b>	An area for which the agency needs to improve performance. These issues should be discussed with the recipient's Regional Office of Head Start for possible technical assistance.
<b>Area of Noncompliance</b>	An area for which the agency is out of compliance with Federal requirements (including but not limited to the Head Start Act or one or more of the regulations) in one or more area of performance. This status requires a written timeline of correction and possible technical assistance or guidance from the recipient's program specialist. If not corrected within the specified timeline, this status becomes a deficiency.
<b>Deficiency</b>	<p>As defined in the Head Start Act, the term "deficiency" means:</p> <p>(A) a systemic or substantial material failure of an agency in an area of performance that the Secretary determines involves:</p> <ul style="list-style-type: none"> <li>(i) a threat to the health, safety, or civil rights of children or staff;</li> <li>(ii) a denial to parents of the exercise of their full roles and responsibilities related to program operations;</li> <li>(iii) a failure to comply with standards related to early childhood development and health services, family and community partnerships, or program design and management;</li> <li>(iv) the misuse of funds received under this subchapter;</li> <li>(v) loss of legal status (as determined by the Secretary) or financial viability, loss of permits, debarment from receiving Federal grants or contracts, or the improper use of Federal funds; or</li> <li>(vi) failure to meet any other Federal or State requirement that the agency has shown an unwillingness or inability to correct, after notice from the Secretary, within the period specified;</li> </ul> <p>(B) systemic or material failure of the governing body of an agency to fully exercise its legal and fiduciary responsibilities; or</p> <p>(C) an unresolved area of noncompliance.</p>

### Performance Summary

Service Area	Applicable Standards	Grant Number(s)	Primary Review Finding Status(s)	Timeframe for Correction	Follow-up Compliance Level
Monitoring ERSEA: Eligibility, Attendance and Enrollment	1302.12(l)-(m)	07CH010578	ANC	N/A	Corrected
Monitoring and Implementing Quality Education and Child Development Services	1302.91(e)(2)(ii)	07CH010578	DEF	N/A	Corrected



## Monitoring and Implementing Quality Education and Child Development Services

### Supporting Teachers in Promoting School Readiness

The recipient does not prepare teachers to implement the curriculum and support children's progress toward school readiness.

**FA-2                      04/02/2021                      ANC                      1302.91(e)(2)(ii)                      Timeframe for Correction: 120 days**

1302.91 Staff qualifications and competency requirements.(e) Child and family services staff. (2) Head Start center-based teacher qualification requirements. (ii) As prescribed in section 648A(a)(3)(B) of the Act, a program must ensure all center-based teachers have at least an associate's or bachelor's degree in child development or early childhood education, equivalent coursework, or otherwise meet the requirements of section 648A(a)(3)(B) of the Act.

The grantee did not ensure all Head Start center-based teachers had at least an associate's degree or bachelor's degree in child development, early childhood education, or equivalent coursework.

A review of the teacher qualification tracking form showed three of eight (37 percent) Head Start teachers did not meet the qualification requirements. In a discussion, the Head Start education and transition coordinator and the senior director confirmed the three teachers did not meet the qualification requirements. They further stated two of the three unqualified teachers were hired in August and October 2020 and had enrolled in a community college to obtain an associate's degree in early childhood education. However, both teachers withdrew from classes in the 2021 spring semester and did not plan on finishing the degree requirements. The third unqualified teacher was hired in 2015, had a preschool child development associate credential, enrolled in college in January 2016 to obtain an associate's degree in early childhood education, and had an expected completion date of December 2021. In addition, none of the three unqualified teachers had professional development plans (PDPs). The senior director stated the program was working on developing PDPs for staff.

The grantee did not ensure all Head Start center-based teachers had at least an associate's degree or bachelor's degree in child development, early childhood education, or equivalent coursework; therefore, it was not in compliance with the regulation.

#### Follow-up

#### Corrected

**Timeframe for Correction: N/A**

The recipient developed a process to ensure all Head Start center-based teachers had at least an associate's degree or a bachelor's degree in child development, early childhood education (ECE), or equivalent coursework. The program trained management staff, revised human resource procedures, and monitored staff qualifications.

In an interview, the Head Start director and human resource manager stated the program received assistance from Regional Training and Technical Assistance and other Head Start programs to support its understanding of teacher qualification requirements and then revised procedures. The human resource manager also said she attended Kansas Head Start Associations Human Resource networking sessions where ideas, policies, and resources were shared.

The Head Start director stated although it was difficult to hire and retain qualified teachers, the program revised procedures to ensure staff was supported in obtaining the required qualifications. A review of documents found the Professional Development Procedure, Procedure for Coaching, and Human Resource policy required that center-based teaching staff had or worked toward a minimum educational requirement of an associate's in early childhood education or related field and required all staff to complete a professional development plan (PDP) within 90 days of hire. The PDPs listed strengths, needs, and areas of support with timelines for the completion of goals. The program had a total of four teachers. Two teachers had the required credentials, the third teacher was on track to complete a bachelor's degree in ECE in November 2022, and the fourth teacher was in the process of completing her associate's degree in ECE.

The human resource manager stated she provided ongoing staff qualification updates to the Head Start director and the leadership team. A review of May 2022 leadership meeting notes confirmed that ongoing discussions on teacher qualifications and updates to PDPs occurred. A review of sampled professional development plans, self-reflections, annual evaluations, and onboarding checklists found that all teachers had or were on a path to obtain an associate's degree or a bachelor's degree in child development.

The recipient developed a process to ensure all Head Start center-based teachers had at least an associate's degree or bachelor's degree in child development, ECE, or equivalent coursework. This area of noncompliance is corrected.



## Monitoring ERSEA: Eligibility, Selection, Enrollment, and Attendance

### Determining, Verifying, and Documenting Eligibility

The recipient does not enroll children or pregnant women who are categorically eligible or who meet defined income-eligibility requirements.

**FA-2**                      **04/02/2021**                      **ANC**                      **1302.12(l)-(m)**                      **Timeframe for Correction: 120 days**

1302.12 Determining, verifying, and documenting eligibility. (l) Program policies and procedures on violating eligibility determination regulations. A program must establish written policies and procedures that describe all actions taken against staff who intentionally violate federal and program eligibility determination regulations and who enroll pregnant women and children that are not eligible to receive Early Head Start or Head Start services. (m) Training on eligibility. (1) A program must train all governing body, policy council, management, and staff who determine eligibility on applicable federal regulations and program policies and procedures. Training must, at minimum: (i) Include methods on how to collect complete and accurate eligibility information from families and third party sources; (ii) Incorporate strategies for treating families with dignity and respect and for dealing with possible issues of domestic violence, stigma, and privacy; and, (iii) Explain program policies and procedures that describe actions taken against staff families, or participants who attempt to provide or intentionally provide false information. (2) A program must train management and staff members who make eligibility determinations within 90 days of hiring new staff. (3) A program must train all governing body and policy council members within 180 days of the beginning of the term of a new governing body or policy council. (4) A program must develop policies on how often training will be provided after the initial training.

The grantee did not establish written policies and procedures describing all actions taken against staff who intentionally violate federal and program eligibility determination regulations and who enrolled children who were not eligible to receive Head Start services. Further, the grantee did not train the governing Board and the policy council on eligibility requirements.

The senior director stated the program did not have written policies and procedures describing actions taken against staff who intentionally violated eligibility determinations. In addition, the senior director also stated the governing Board and the policy council did not receive eligibility determination training.

The grantee did not establish written policies and procedures to describe actions against staff who intentionally violated federal and program eligibility determination regulations and did not meet training requirements; therefore, it was not in compliance with the regulation.

### Follow-up

#### Corrected

**Timeframe for Correction: N/A**

The recipient established written policies and procedures describing all actions taken against staff who intentionally violate federal and program eligibility determination regulations and enroll children who were not eligible to receive Head Start services. The program created an Administration Policy, revised the Personnel Handbook, and trained the governing board and the policy council on eligibility requirements.

A review of Clay County Child Care Center's corrective action plan found the program obtained input from the Regional Training and Technical Assistance Network and the Board's legal expert to correct the finding. In an interview, the Head Start director explained the program's updated Administration Policy and Personnel Handbook included language detailing actions against staff who intentionally violate eligibility regulations. The Head Start director explained the revisions were shared during the coordinator's meeting and accessible to all staff via a cloud-based management system. A review of the revised documents found that an intentional violation of eligibility determination regulations was a major offense and subject to termination of employment. A review of Board and policy council meeting minutes confirmed both groups approved the Administration Policy.

In an interview, a Board member stated the program trained the Board and the policy council on eligibility requirements through ongoing updates and discussions related to the Office of Head Start monitoring report and corrective actions. A review of annual training materials on ERSEA requirements verified the inclusion of the wording related to violations and resulting consequences.

The recipient established written policies and procedures describing all actions taken against staff who intentionally violate federal and program eligibility determination regulations and who enroll children who were not eligible to receive Head Start services and trained the governing board and the policy council on eligibility requirements. This area of noncompliance is corrected.

----- End of Report -----