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To: Board Chairperson

Mr. Richard English Board Chairperson Community Action for Improvement, Inc. 1380 LaFayette Pkwy. Lagrange, GA 30241-2570 From: Responsible HHS Official

Ms. Yvette Sanchez Fuentes Director, Office of Head Start

Date 12.21.12

Overview of Findings

On 11/19/2012, the Administration for Children and Families (ACF) conducted an on-site monitoring follow-up review of the Community Action for Improvement, Inc. Head Start and Early Head Start programs to determine whether the previously identified findings had been corrected. We wish to thank the governing body, Policy Council, staff, and parents of your program for their cooperation and assistance during the review. This Head Start Review Report has been issued to Mr. Richard English, Board Chairperson, as legal notice to your agency of the results of the on-site program review.

Based on the information gathered during our review, we have closed the previously identified findings. Accordingly, no corrective action is required at this time. If you have questions about this report, please contact your ACF Regional Office.

Distribution of the Head Start Review Report

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

Mr. Jeffrey Fredericks, Regional Program Manager

Ms. Keosha Godfrey, Policy Council Chairperson

Mr. Jerome Anderson, CEO/Executive Director

Mrs. Angela Jackson-Owens, Head Start Director

Overview Information

Review Type:

FTL Solo

Organization:

Community Action for Improvement, Inc.

Program Type:

Head Start and Early Head Start

Team Leader:

Ms. Judy Deane

Funded Enrollment HS:

880

Funded Enrollment EHS: 220 Funded Enrollment ARRA: 72

Status of Previously Identified Deficiency Determinations

Management Systems

Date of Review in which	Applicable	Program Type	Status	Finding Type
Deficiency was identified	Standards			
Jul 11, 2012	1304.52(i)(1)(iii)	HS and EHS	Corrected	Human Resources
Jul 11, 2012	1304.52(i)(1)(iv)	HS and EHS	Corrected	Human Resources

PART 1304 - Program Performance Standards For Operation Of Head Start Programs By Grantees And Delegate Agencies

1304.52 Human Resources Management.

- (i) Standards of conduct.
- (1) Grantee and delegate agencies must ensure that all staff, consultants, and volunteers abide by the program's standards of conduct. These standards must specify that
- (iii) No child will be left alone or unsupervised while under their care; and Other (7/11/2012)

The grantee did not ensure all staff abided by the program's standards of conduct specifying no child would be left alone or unsupervised while under their care. A review of an Incident Report submitted to the Regional Office March 6, 2012 found it stated a child was left unattended on the playground for approximately 20 minutes on February 22, 2012. The incident was originally reported by the family in the form of a complaint to one of the agency's Board members, who shared the information with the Executive Director, and the Executive Director shared the information with the Head Start Director on March 2, 2012.

The Incident Report stated at the time the child was left unsupervised on the playground, his grandmother came to pick him up and was told the child's mother already picked him up. However, it was later determined the teacher and teacher assistant did not provide adequate supervision of the child, resulting in their providing false information to the grandmother regarding the child's whereabouts. A review of the video surveillance recordings of the playground from the period found the teacher assistant returned to the playground to retrieve the child, who was hiding in a tunneled play structure. She went to the playground after it was determined the child was not picked up by his mother.

A review of documents found the Georgia Department of Human Services conducted a Child Protective Services investigation and found the incident was substantiated. The incident was also investigated by the Georgia Department of Early Care and Learning's Bright From the Start (BFTS) agency. The investigation found the grantee was in violation of Section 591-1-1-.32 (6): Supervision, which required children to be supervised at all times. The grantee was then required to submit a written Plan of Improvement to BFTS by April 30, 2012. A review of the plan determined the agency found it was acceptable.

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The grantee did not ensure all children were supervised at all times in accordance with the program's standards of conduct; therefore, it was not in compliance with the regulation.

FTL Solo - Corrected

The grantee ensured staff abided by the standards of conduct requiring no child to be left unsupervised. The Executive Director stated the first action taken once the February 12, 2012 incident was reported by a Board member was to suspend the two classroom staff for leaving a child unsupervised, attempting to hide the infraction, and not reporting the situation. In addition, the lead teacher in the Early Head Start classroom was acting in the capacity of Center Manager and was also suspended for not reporting the situation. (This was a second and unrelated incident identified at the Franklin Center.)

Once the Policy Council met and approved the motion, all three staff members were terminated. The Head Start Director stated the procedures for transitions were revised to include actual counting of children at each transition to ensure none were left behind, either in the classroom or on the playground. Staff at the Franklin Center received refresher training--beginning in March and completed for all staff by May 2012--on supervising children and reporting incidents to the proper agencies. The training was repeated for all staff during pre-service prior to the beginning of the current program year.

A review of the training materials found sign-in sheets for training for the Franklin Center as well as for program-wide pre-service. In addition, a review of the corrective action plan required by Bright From the Start--the licensing agency--and the reports from the inspections, found they included descriptions of the infractions in the initial reports and the corrections in the subsequent reports.

A review of Board and Policy Council meeting minutes found the Board and Policy Council were kept apprised of the situation and actions taken to resolve the deficiency. The Executive Director stated the meeting minutes did not document the full discussions but said he provided written reports to the Board weekly. A review of the weekly reports confirmed the Board was informed of program activities as they occurred. Observations in four classrooms at three centers and interviews with staff determined staff understood the reporting requirements and the revised transition procedures.

The grantee ensured staff abided by the standards of conduct requiring no child to be left unsupervised; therefore, it was in compliance with the regulation.

PART 1304 - Program Performance Standards For Operation Of Head Start Programs By Grantees And Delegate Agencies

1304.52 Human Resources Management.

- (i) Standards of conduct.
- (1) Grantee and delegate agencies must ensure that all staff, consultants, and volunteers abide by the program's standards of conduct. These standards must specify that
- (iv) They will use positive methods of child guidance and will not engage in corporal punishment, emotional or physical abuse, or humiliation. In addition, they will not employ

methods of discipline that involve isolation, the use of food as punishment or reward, or the denial of basic needs.

Other (7/11/2012)

The grantee did not ensure its staff abided by the program's standards of conduct specifying they were to use only positive methods of child guidance. On Thursday, February 2, 2012, the parent of a child--along with Bright From the Start (BFTS), the State of Georgia child care licensing agency--initiated a complaint, stating a child was injured by a staff member. The Head Start Director reported the incident in a February 3, 2012 email to the Regional Office, stating on January 31, 2012, a child was injured after the teacher assistant forced his head onto a sleeping mat used for naps.

On February 7, 2012, the Head Start Director contacted the Regional Office and provided a detailed account of the incident. A review of the email found it stated on January 31, the teacher assistant was working alone in the classroom, as the teacher was out on leave. After lunch, the children were taken to the restroom, and 9 of the 11 children present went outside with other preschool teachers while the other 2 children remained inside to nap. The teacher assistant stated after the children were placed on their sleeping mats, she heard a tapping noise and saw one child's head was covered with a blanket. When she pulled the blanket back, she saw he was bleeding. A teacher from across the hall and the Center Manager came to assist in caring for the child's injury. The Center Manager called the mother, who came to the center immediately, signed the Incident Report, and took her son to the emergency room. The child's father called the Center Manager later the same day and reported his son needed two stitches above his nose to close the cut.

An investigation of the incident found the teacher assistant did not provide an accurate account of what happened. A review of the Incident Report and a Child Care Services Initial Contact sheet detailing the complaint made to BFTS found the child told his mother the teacher hurt him because he would not take a nap. The child provided the same account to a police officer on February 2, 2012. Further investigation into the child's account determined it was true based on the teacher assistant's confession.

On February 3, 2012, BFTS contacted the Regional Office to report both the incident and the teacher assistant's confession. On February 9, 2012, the Georgia Head Start Collaboration Director from BFTS contacted the Regional Office to inform the Regional Office the accused teacher assistant stated she was guilty, and the Collaboration Director stated the teacher assistant would be prosecuted for child cruelty. A review of the Child Care Services Initial Contact sheet submitted by the Child Care Consultant who investigated the incident was forwarded electronically to the Regional Office, with the emergency room Intake form and pictures of the child's injury attached. The center was cited for failing to report an incident requiring medical attention.

On May 22, 2012, the Head Start Director emailed the Program Specialist additional documents related to the issue, including the Plan for Improvement submitted to BFTS, BFTS' letter accepting the plan, a receipt for the \$499 the grantee was fined for failing to report an incident requiring medical attention, and a list of child abuse and neglect trainings provided to current staff members.

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The grantee did not ensure staff used only positive methods of child guidance; therefore, it was not in compliance with the regulation.

FTL Solo - Corrected

The grantee ensured all staff followed the standards of conduct, including using only positive methods of child guidance. The grantee took steps to ensure staff did not engage in corporal punishment, emotional or physical abuse, or humiliation. In an interview, the Executive Director stated the first action taken after the January 31, 2012 incident was to remove the staff person from the classroom, as well as the person in charge of the center at the time. The teacher assistant was terminated as soon as the Policy Council was able to meet to confirm the termination, and the Center Manager was demoted from the position.

The Head Start Director stated all staff, including management staff, received additional training on the standards of conduct, proper methods of child guidance, and reporting requirements beginning in March 2012 and again during pre-service before the beginning of the current program year. In addition, increased classroom monitoring by the Center Managers and Content Managers was implemented to ensure staff followed the standards of conduct, and children were safe.

A review of training records for the Haralson Center, as well as pre-service training records for the program confirmed training took place. A review of Board meeting minutes and Executive Director's reports to the Board determined the Board was kept up to date on the situation, including the corrective actions taken to resolve the deficiency. A review of Policy Council meeting minutes determined the Policy Council was also kept up to date regarding the actions taken. A review of reports from Bright From the Start--the licensing agency--found the licensing agency accepted the corrective action plan and conducted follow-up inspections, and the grantee maintained compliance with licensing requirements.

The grantee ensured staff followed the standards of conduct, including using only positive methods of child guidance; therefore, it was in compliance with the regulation.

— END OF REPORT —