



ADMINISTRATION FOR
CHILDREN & FAMILIES

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Program Performance Summary Report

To: Authorizing Official/Board Chairperson

Dr. Lewis D Ferebee

District of Columbia Public Schools

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From: Responsible HHS Official

Date: 09/30/2019

Dr. Deborah Bergeron

Director, Office of Head Start

From 07/10/2019 to 07/10/2019, the Administration for Children and Families conducted a monitoring review of the District of Columbia Public Schools Head Start program. This report contains information about the grantee's performance and compliance with the requirements of the Head Start Program Performance Standards (HSPPS) or Public Law 110-134, *Improving Head Start for School Readiness Act of 2007*.

The Office of Head Start would like to thank your governing body, policy council, parents, and staff for their engagement in the review process. Based on the information gathered during this review, we have found your program needs improvement in one or more areas. The report provides you with detailed information in each area where program performance did not meet one or more applicable HSPPS, laws, regulations, and policy requirements, and the required timeframes for corrective action.

Please contact your Regional Office for guidance should you have any questions or concerns. Your Regional Office will follow up on the content of this report and can work with you to identify resources to support your program's continuous improvement.

DISTRIBUTION OF THE REPORT

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

Ms. Brenda Hewitt, Regional Program Manager

Dr. Amanda Alexander, Chief Executive Officer/Executive Director

Dr. Cheryl Ohlson, Head Start Director

Glossary of Terms

Compliant	No findings. Meets requirements of Head Start Program Performance Standard.
Area of Concern	An area for which the agency needs to improve performance. These issues should be discussed with the grantee's Regional Office of Head Start for possible technical assistance.
Area of Noncompliance	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 areas of performance. This status requires a written timeline of correction and possible technical assistance or guidance from the grantee's program specialist. If not corrected within the specified timeline, this status becomes a deficiency.
Deficiency	<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"> (i) a threat to the health, safety, or civil rights of children or staff; (ii) a denial to parents of the exercise of their full roles and responsibilities related to program operations; (iii) a failure to comply with standards related to early childhood development and health services, family and community partnerships, or program design and management; (iv) the misuse of funds received under this subchapter; (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 (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; <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

Applicable Standards	Grant Number(s)	Timeframe for Correction	Compliance Level	Service Area
1302.101(a)(1)	03CH3445 03CH010214	30 days	DEF	Program Management
642(c)(1)(E)(iv)(V)(bb)	03CH3445 03CH010214	30 days	DEF	Program Governance
1302.47(b)(5)(iii)	03CH3445 03CH010214	30 days	DEF	Safety Practices



Program Management and Quality Improvement

Program Management

Does the grantee establish a management structure consisting of staff, consultants, or contractors who ensure high-quality service delivery; have sufficient knowledge, training, experience, and competencies to fulfill the roles and responsibilities of their positions; and provide regular supervision and support to staff?

Monitoring Results:

- The management/organizational structure did not provide effective management and oversight of all program areas.
1302.101(a)(1)

DEF 1302.101(a)(1)

Timeframe for Correction: 30 days

1302.101 Management system. (a) Implementation. A program must implement a management system that: (1) Ensures a program, fiscal, and human resource management structure that provides effective management and oversight of all program areas and fiduciary responsibilities to enable delivery of high-quality services in all of the program services described in subparts C, D, E, F, G, and H of this part;

The grantee did not implement a management system that ensured its program structure provided effective management and oversight of all program areas to enable the delivery of high-quality services to children and families. The grantee's current management structure did not provide effective oversight and monitoring of all program areas to ensure children and families received quality services and that children remained safe.

The grantee operates 340 Head Start classrooms within 59 elementary schools in the District of Columbia area under two grants (03CH010214 and 03CH3445). The grantee assigned the responsibility of oversight of its school-based Head Start classrooms to the principals. However, the principals were not provided the guidance or support necessary to effectively implement the Head Start Program Performance Standards (HSPPS) and ensure children's safety.

Principals were responsible for ensuring the HSPPS were implemented in each Head Start classroom. However, the grantee did not have a system in place to regularly engage, train, and support the school principals to ensure they were knowledgeable of and met Head Start requirements. The grantee stated it provides each new principal an orientation at the beginning of their employment on the HSPPS; however, there was no ongoing training specific to Head Start, beyond the initial orientation.

Principals were responsible for supervising the Head Start teachers and assistant teachers; but they did not conduct ongoing supervision with teaching staff. As noted, principals were given the responsibility for ensuring the HSPPS were followed, yet did not provide adequate supervision to the Head Start teachers and assistant teachers to ensure compliance with the standards.

Ineffective management, lack of oversight, and monitoring contributed to five health and safety incidents in five different schools. Since February 2019, the grantee reported incidents in which Head Start children were not properly supervised and were left unattended ranging from 3 minutes to 17 minutes.

The management system in place did not reduce or prevent reoccurring incidences related to children's safety. In addition, principals responsible for ensuring teachers implement HSPPS and strategies to prevent health and safety issues were not familiar with the standards or included in the development of strategies to reduce risk.

The current management, supervision, and oversight did not prevent two incidents of improper supervision from occurring in October and December 2018. Head Start children were not properly supervised while using the restroom because proper staff/child ratios and Active Supervision policies were not followed; another example of poor staff supervision and guidance related to the HSPPS.

Active Supervision seminars were facilitated by LEarning together to Advance our Practice (LEAP) Instructional Specialists and completed in all schools in March 2019. The LEAP Instructional Specialists guided each school-based Early Childhood Education (ECE) team of teachers and assistant teachers through the process of developing a detailed plan for their classrooms to ensure active supervision strategies were consistently implemented throughout the day. Principals were provided professional development on active supervision in cluster meetings; however, principals were not included in the planning, decision-making process, or the monitoring of the plans but were given the responsibility of ensuring the implementation strategies were being followed. Additionally, all teachers and assistant teachers were required to complete online Professional Development Modules on active supervision, health and safety practices, playground safety practices, and field trip safety practices; however, the application of those practices were not monitored. Incidents of unsupervised children continued to occur.

In response to monitoring findings and at the direction of the Chancellor, a cross-office working group comprised of grantee ECE Directors, Office of General Counsel, Office of Family and Public Engagement, Office of Talent and Culture, and Labor Management and Employee Relations was convened on March 6, 2019 to support the ongoing work of the ECE Division (ECED). Based on the needs and priorities of the program, the grantee's ECED leadership team developed a working plan that included adequate ratio coverage for proper supervision, reviewing and aligning incident reporting with the HSPPS, and continued communication and engagement with the Advisory Board and governance structure; however, further supervision incidents continued to occur.

The grantee did not implement a management system that ensured its program structure provided effective management and oversight of all program areas, for the delivery of high-quality services to children and families; therefore, it was not in compliance with the regulation.

Program Governance

Does the grantee maintain a formal structure of program governance to oversee the quality of services for children and families and to make decisions related to program design and implementation?

Monitoring Results:

- The governing body members did not oversee the agency's progress in carrying out programmatic provisions of the agency's grant application. 642(c)(1)(E)(iv)(V)(bb)

DEF 642(c)(1)(E)(iv)(V)(bb)

Timeframe for Correction: 30 days

Sec. 642 Powers and Functions of Head Start Agencies (c) Program Governance- Upon receiving designation as a Head Start agency, the agency shall establish and maintain a formal structure for program governance, for the oversight of quality services for Head Start children and families and for making decisions related to program design and implementation. Such structure shall include the following: (1) GOVERNING BODY- (E) RESPONSIBILITIES- The governing body shall (iv) be responsible for other activities, including-- (V) reviewing and approving all major policies of the agency, including--(bb) such agency's progress in carrying out the programmatic and fiscal provisions in such agency's grant application, including implementation of corrective actions; and

The grantee's governing body did not ensure implementation of corrective actions.

The grantee had multiple health and safety incidents in the past 9 months, which are detailed in this report. The governing body was made aware of the incidents and approved proposed corrective action plans; however, the governing body did not provide sufficient oversight to mitigate further incidents from occurring.

In response to the monitoring report dated December 19, 2018, and at the direction of the Chancellor, a cross-office working group comprised of DCPS Early Childhood Education (ECE) Directors, Office of General Counsel, Office of Family and Public Engagement, Office of Talent and Culture, and Labor Management and Employee Relations was convened to support the ongoing work of the ECE Division (ECED). Based on the immediate and medium-term needs and priorities of the program, the DCPS ECED leadership team developed a working plan that included an adequate ratio coverage structure. On January 25, 2019, an immediate supervision plan was developed by the Strategy and Operations Team and the ECE Directors and was communicated to principals and ECE staff. The DCPS/ECE Supervision Policy was edited, finalized, and shared with the principals and the Policy Council on January 25, 2019. Implementation of the immediate supervision plan started January 28, 2019; however, supervision incidents continued to occur.

The grantee's governing body did not ensure implementation of corrective actions; therefore, it was not in compliance with the regulation.



Monitoring and Implementing Quality Health Services

Safety Practices

Does the grantee implement a process for monitoring and maintaining healthy and safe environments?

Monitoring Results:

- The grantee did not maintain a system for ensuring appropriate safety practices. 1302.47(b)(5)(i); 1302.47(b)(5)(ii); 1302.47(b)(5)(iii); 1302.47(b)(5)(iv); 1302.90(c)

DEF 1302.47(b)(5)(iii)

Timeframe for Correction: 30 days

1302.47 Safety practices (b) A program must develop and implement a system of management, including ongoing training, oversight, correction and continuous improvement in accordance with §1302.102, that includes policies and practices to ensure all facilities, equipment and materials, background checks, safety training, safety and hygiene practices and administrative safety procedures are adequate to ensure child safety. This system must ensure: (5) Safety practices. All staff and consultants follow appropriate practices to keep children safe during all activities, including, at a minimum: (iii) Appropriate indoor and outdoor supervision of children at all times;

The grantee did not follow appropriate practices to keep children safe during all activities including appropriate indoor and outdoor supervision of children at all times. On five separate occasions Head Start children were left unsupervised from 3 minutes to 17 minutes.

On February 7, 2019, a 4-year-old Head Start child enrolled at Nalle Elementary was found wandering the halls of the school unattended. Video footage confirmed the child left the classroom, walked down the hallway, interacted with another class and a staff member before running to the principal. The principal handed the child to a LEAP Instructional Specialist who escorted the child back to the classroom. There were two adults in the classroom, a long-term substitute teacher and a volunteer grandparent (the assistant teacher who was also assigned to the class was at lunch). According to staff, after the child used the restroom, the child exited the restroom--that was shared with an adjoining classroom--and went out to the hallway through the other classroom. The security report stated the child was left unattended for 3 minutes and 19 seconds.

On April 11, 2019, a Head Start child enrolled at Bancroft Elementary was left unattended in the classroom for 17 minutes while the class was outside for recess. According to the incident report, one teacher and two assistant teachers escorted the class to the playground. Once outside, the teacher realized a child was missing. The teacher instructed an assistant teacher to inform the security officer. While the security officer was checking the playground, the teacher went inside and found the child in the classroom sitting on a chair. The child was reunited with the class on the playground.

On April 23, 2019, a Head Start child enrolled at Thomas Elementary was left unsupervised for approximately 8 minutes during a fire drill that occurred toward the end of nap time. According to the incident report, several children were still asleep and needed to be woken up when the fire alarm sounded. The lead teacher was out of the building on her break. The Literacy Lab tutor and the assistant teacher exited the building with the children. Once outside of the building and on the playground, the Literacy Lab tutor was asked by a LEAP Instructional Specialist how many children were present. The Literacy Lab tutor stated 11; however, she only had 9 children with her and the assistant teacher had 1. When asked the whereabouts of the eleventh child, the Literacy Lab tutor stated she did not know where the child was. The LEAP Instructional Specialist proceeded into the building and found the child still asleep on her mat. The fire drill lasted 3 minutes and 20 seconds, and according to the Director of Strategy and Operations, the children remained outside an additional 1 to 2 minutes. The incident report from the LEAP Instructional Specialist stated the incident lasted 8 minutes.

On May 8, 2019, a Head Start child enrolled at Turner Elementary was injured while in the restroom. According to the incident report, the child slipped, fell, and hit his head on the restroom floor while walking to the sink to wash his hands. The child had a large gash on his head and was taken to the nurse's office where 911 was called.

According to video footage, teachers walked up and down the hallway as Head Start children used their respective restrooms and drank from the water fountain. The video showed staff checking on children but not providing continuous supervision of children by sight and sound, as stated in the DCPS Early Childhood Education (ECE) Child Supervision Policy. Additionally, it was not clear who was supervising each group of children.

The video footage showed the boys playing in the restroom and more than one child falling. It was unclear in the video footage which child was injured. It was also stated in the incident report that four of the boys, including the injured child, admitted to splashing in the sink. The child's family was contacted by the school officer, and the child's father arrived in time to depart in the ambulance with the child. The parents reported the child received eight stitches.

On May 14, 2019, a Head Start child enrolled at Amidon-Bowen Elementary School was found unsupervised on the enclosed playground for approximately 11 minutes. According to the incident report, the Head Start class had just entered the building from the playground and were on their way to the cafeteria. The child was carried in from the playground by his teacher, and after the teacher put the child down, he ran down the hallway and out the side door that leads to the playground. The fifth-grade class entered the same playground 11 minutes later and the Head Start child was immediately seen by the fifth-grade teacher. The fifth-grade teacher contacted the assistant principal to inform her that a Head Start child was on the playground unsupervised. When

the assistant principal went to the playground, the Head Start child was sitting with the fifth-grade teacher. The Head Start child was reunited with his class in the cafeteria. It was unclear if the Head Start teachers knew the child was missing. The child's parents were notified, and the DC Child and Family Services Agency was contacted.

Additionally, two separate incidents occurred in which Head Start children were not properly supervised while using the restroom in October and December 2018 and were part of previous monitoring reports.

The grantee did not follow appropriate practices to keep children safe during all activities including appropriate indoor and outdoor supervision of children at all times; therefore, it was not in compliance with the regulation.

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