



ADMINISTRATION FOR
CHILDREN & FAMILIES

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Program Performance Summary Report

To: Authorizing Official/Board Chairperson

Mr. Roger Daniel

BIG SANDY AREA COMMUNITY ACTION PROGRAM, INC

230 Court St Rm 332

Paintsville, KY 41240 - 1606

From: Responsible HHS Official

Date: 02/19/2019

Dr. Deborah Bergeron

Director, Office of Head Start

From December 3, 2018 to December 7, 2018, the Administration for Children and Families (ACF) conducted a Focus Area Two (FA2) monitoring review of the BIG SANDY AREA COMMUNITY ACTION PROGRAM, INC 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

Ms. Frances Majestic, Regional Program Manager

Ms. Wanda Thacker, Chief Executive Officer/Executive Director

Ms. Tracy Jenkins, Head Start Director

Glossary of Terms

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
75.403(a)-(g)	04CH010269	120 days	ANC	Budget Execution



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 team uses their knowledge, training, experience, and competencies to ensure high-quality service delivery. 1302.91(a)
- The management/organizational structure provides effective management and oversight of all program areas. 1302.101(a)(1)
- Managers provide ongoing supervision and professional development to support individual staff. 1302.101(a)(2); 1302.92(b)

Ongoing Monitoring and Continuous Improvement

Does the grantee use data to identify program strengths, needs, and areas needing improvement; evaluate progress toward achieving program goals and compliance with the the program performance standards; and assess the effectiveness of professional development?

Monitoring Results:

- Data are aggregated, analyzed, and compared to inform strategies for continuous improvement in all service areas and to identify risk. 1302.102(c)(2)(i)
- Information is used for ongoing monitoring and improvement of teaching practices, child-level assessments, family outcomes, health and safety practices, and other comprehensive services. 1302.102(c)(2)(iv)
- The grantee evaluates progress toward meeting program goals. 1302.102(b)(1)(i)

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 adopt practices that ensure active, independent, and informed governance of the Head Start agency. 642(c)(1)(E)(ii)
- The governing body members use data (both program data and external information) to oversee the provision of quality services for children and families and to ensure progress toward school readiness. 1301.2(b)(2)
- The governing body members oversee the agency's progress in carrying out programmatic provisions of the agency's grant application. 642(c)(1)(E)(iv)(V)(bb)

Does the policy council engage in the direction of the program, including program design and planning of goals and objectives?

Monitoring Results:

- The policy council members submit activities to support active involvement of parents in program operations and ensure the agency's responsiveness to community and parent needs. 642(c)(2)(D)(i)
- The policy council members use information to ensure the program is delivering quality services and to participate actively in the direction of the program. 1302.102(d)



Monitoring and Implementing Quality Education and Child Development Services

Alignment with School Readiness

Do the grantee's school readiness efforts align with the expectations of receiving schools, the Head Start Early Learning Outcomes Framework (HSELOF), and State early learning standards?

Monitoring Results:

- The grantee aligns school readiness efforts with the expectations of receiving schools, the HSELOF, and the State early learning standards. 1302.102(a)(3)
- The grantee understands expectations of the receiving schools and collaborates to promote successful transitions to kindergarten. 1302.71(a)
- The grantee implements strategies and practices to support successful transitions for children and families out of Early Head Start. 1302.70(a)
- The grantee uses data to show children are ready to meet the expectations of receiving schools. 1302.102(c)(2)(ii)-(iii); 1302.33(b)(1)

Effective and Intentional Teaching Practices

Do the grantee's teaching practices intentionally promote progress toward school readiness and provide high-quality learning experiences for children?

Monitoring Results:

- The grantee organizes activities, schedules, lesson plans, and learning experiences that are responsive to the children's individual developmental patterns and progressions as described in the HSELOF. 1302.31(b)(1)(ii)
- The grantee individualizes for children, including those who are not making progress toward school readiness. 1302.33(b)(2)
- The grantee provides nurturing and responsive learning environments for children, including ensuring environments promote critical thinking and problem solving, encourage children's engagement, and are communication- and language-rich. 1302.31(b)(1)(i)
- The grantee supports child-teacher interactions, socialization, development, and learning at all times, including daily routines and mealtimes. 1302.31(e)
- The grantee ensures the full inclusion of children with disabilities. 1302.61(a)
- The grantee uses strategies and activities to recognize bilingualism and biliteracy as strengths for children who are dual language learners. 1302.31(b)(2)
- The grantee promotes successful transitions for children entering kindergarten. 1302.71(d)
- The grantee supports teachers in providing effective classroom management and positive learning environments. 1302.45(a)(1)

Supporting Teachers in Promoting School Readiness

Does the grantee prepare teachers to implement the curriculum and support children's progress toward school readiness?

Monitoring Results:

- The grantee assists education staff in using data to individualize learning experiences to improve outcomes for all children. 1302.92(b)(5)
- The grantee supports staff in effectively implementing curricula, monitoring curriculum implementation, and ensuring fidelity. 1302.32(a)(2)
- The grantee identifies strengths, areas of needed support, and staff who would benefit from intensive coaching for all education staff. 1302.92(c)(1)
- The mental health consultant supports teaching practices through strategies to address teacher and individual child needs. 1302.45(b)(2)
- The grantee hires and retains teachers with the appropriate qualifications. 1302.91(e)(1-2)

Home-based Program Services

Not Applicable.



Monitoring and Implementing Quality Health Services

Child Health Status and Care

Does the grantee effectively monitor and maintain timely information on children's health status and care, including ongoing sources of health care, preventive care, and follow-up?

Monitoring Results:

- The grantee ensures children are up to date on a schedule of age-appropriate medical and oral health care (EPSDT). 1302.42(b)(1)(i)
- The grantee ensures ongoing care and extended follow-up care. 1302.42(c)-(d)
- The grantee ensures each child has an ongoing source of continuous health care. 1302.42(a)(1)
- The grantee educates, supports, and collaborates with parents to share information about the child's health and well-being. 1302.41(a)

Mental Health

Does the grantee support a program-wide culture that promotes mental health and social and emotional well-being, and uses mental health consultation to support staff?

Monitoring Results:

- The grantee ensures mental health consultation is available to collaborate with staff and families in a timely and effective manner. 1302.45(a)(2)
- The mental health consultant assists the grantee in implementing strategies to identify and support children with mental health and social and emotional concerns. 1302.45(b)(1)
- The mental health consultant supports staff and families in meeting mental health and social and emotional needs. 1302.45(b)(3)

Oral Health and Nutrition

Does the grantee maintain and monitor for effective oral health practices and nutrition services that meet the nutritional needs and accommodate feeding requirements and allergies?

Monitoring Results:

- The grantee promotes effective oral health hygiene by ensuring children with teeth are assisted in brushing their teeth once a day. 1302.43
- The grantee implements culturally and developmentally appropriate nutrition services, including meeting the nutritional and feeding needs of babies and young children. 1302.44(a)(1)
- The grantee posts individual child food allergies prominently where staff can view wherever food is served. 1302.47(b)(7)(vi)

Safety Practices

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

Monitoring Results:

- The grantee keeps all facilities safe through an ongoing system of preventive maintenance. 1302.47(b)(1)(ix)
- The grantee keeps all equipment and materials safe through an ongoing system of preventive maintenance. 1302.47(b)(2)(v)
- The grantee maintains 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)
- The grantee ensures all staff have completed the background checks prior to hire. Sec. 648A(g)(3)

Services to Pregnant Women

Not Applicable.



Monitoring and Implementing Quality Family and Community Engagement Services

Family Well-being

Does the grantee collaborate with families to support family well-being, parents' aspirations, and parents' life goals?

Monitoring Results:

- The grantee supports family goal setting and tracks family strengths, needs, and progress toward goals. 1302.52(c)(3)
- The grantee provides resources that support family well-being, either within the program or through community partnerships. 1302.45(b)(5); 1302.50(b)(3); 1302.53(a)(2)(vi)

Strengthening Parenting and Parent-Child Supports

Does the grantee provide services that strengthen parent-child relationships and support parents in strengthening parenting skills?

Monitoring Results:

- The grantee implements family engagement strategies designed to foster parental confidence, including opportunities to connect with other parents. 1302.51(a)
- The grantee offers parents the opportunity to practice parenting skills and build on their knowledge. 1302.51(b)

Family Engagement in Education and Child Development Services

Does the grantee provide education and child development services that recognize parents' roles as children's lifelong educators and encourage parents to engage in their child's education?

Monitoring Results:

- The grantee helps parents support the learning and development of their children. 1302.50(b)(1)
- The grantee shares information with parents about their child's development and gathers information from parents about their child's development. 1302.34(b)(2)
- The grantee supports families in their transition into and out of Head Start. 1302.71(b)(2)
- The grantee prepares parents to advocate for their child. 1302.71(b)(1)
- The grantee supports parents of children with disabilities. 1302.62(b)
- The grantee supports parents in promoting the social and emotional development of their child. 1302.46(b)(1)



Monitoring and Implementing Fiscal Infrastructure

Budget Planning and Development

Does the grantee develop and implement its budget to sustain management, staffing structures, and the delivery of services that support the needs of enrolled children and families?

Monitoring Results:

- The grantee takes into account the program's goals and objectives when developing the budget to ensure the provision of comprehensive services and the continuity of care. 1302.101(a)(3)
- The governing body reviews and approves the annual operating budget. 642(c)(1)(E)(iv)(VII)(aa); 642(c)(1)(E)(iv)(VII)(bb); 642(c)(1)(B)(i); 642(d)(2)(A)-(I); 642(d)(3)
- The policy council is involved in the budget development process. 642(c)(2)(D)(iv); 642(d)(2)(A)-(I); 642(d)(3)
- The grantee's budget development process takes into account program goals and objectives to set priorities and make trade-offs, showing the program intentionally allocated resources to its highest priority goals and objectives. 1302.102(b)(1)(iii)

Ongoing Fiscal Capacity

Does the grantee plan and implement a fiscal management system that supports the organization's ongoing capacity to execute its budget over time and meet the needs of its organization?

Monitoring Results:

- The grantee analyzes fiscal needs when selecting a fiscal officer. 1302.91(c)
- The grantee identifies, assesses, and addresses risks such as natural disasters, child injury, and electronic theft, including insurance coverage, bonding, systems improvement, and other risk reduction measures. 1303.12; 1303.52(b)
- The grantee implements staffing and internal controls that support the program's financial management system. 75.303(a)(b) and (e)

Budget Execution

Does the grantee's financial management system provide for effective control over and accountability for all funds, property, and other assets?

Monitoring Results:

- The grantee effectively manages personnel compensation and fringe benefits. 653(a); 75.302(b)(4); 75.302(b)(3); 75.303(c); 75.303(d); 75.305(b)(1); 75.414; 75.430(i); 75.405(a); 75.441
- The grantee did not have a system for determining whether individual expenses are necessary, reasonable, allocable, and adequately documented. 75.302(b)(7); 75.328(a)(4)(5)(7); 75.328(b); 75.329(a)-(b); 75.403(a)-(g); 75.329(a)-(b); 75.332; 75.327(h)

ANC 75.403(a)-(g)

Timeframe for Correction: 120 days

75.403 Factors affecting allowability of costs. Except where otherwise authorized by statute, costs must meet the following general criteria in order to be allowable under Federal awards: (a) Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles. (b) Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items. (c) Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the non-Federal entity. (d) Be accorded consistent treatment. A cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost. (e) Be determined in accordance with generally accepted accounting principles (GAAP), except, for state and local governments and Indian tribes only, as otherwise provided for in this part. (f) Not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program in either the current or a prior period. See also §75.306(b). (g) Be adequately documented. See also §§75.300 through 75.309.

The grantee did not ensure costs incurred for the purchase of supplies and services were adequately documented. The grantee's internal fiscal policies and procedures contained processes for identifying and documenting allowable costs; however, the grantee did not exercise consistency in following policies.

A review of the grantee's fiscal policies and procedures manual described its requirement for confirming the receipt of goods and services. However, during transaction testing, multiple items of cost were observed as not having documentation demonstrating receipt of supplies and services. Specifically, documentation could not be provided showing proof of receipt and date of delivery for medical supplies, advertising services and office supplies purchased with Head Start funds. In addition, there was no process for receiving and documented items purchased or services received by the grantee.

During an interview with the Finance Officer, she acknowledged she knew when merchandise was delivered because she received an email that says, Out for Delivery. She also mentioned that she logs into vendor accounts to check the status of items purchased on occasion, which also provided the status of items being delivered. After asking the Finance Officer for evidence of the emails

to confirm delivery of items, she provided a printout of an order history and she showed an email from the vendor with an Out for Delivery status; however, there was no proof of signature, packing slip, or delivery receipt provided.

The grantee did not ensure that all costs incurred for the purchase of supplies and servers were adequately documented; therefore, it was not in compliance with the regulation.

Facilities and Equipment

Does the grantee comply with application, prior approval, and reporting requirements for facilities purchased, constructed, or renovated with Head Start funds?

Monitoring Results:

- The grantee ensured it received prior ACF approval for use of funds. 75.308(c)(1)(xi)
- The grantee filed or posted a notice of federal interest that reflects the use of funds. 1303.46(b)(1)-(4)
- The grantee maintains a complete inventory of all equipment purchased, in whole or in part, with Head Start funds. 75.320(d)(2)



Monitoring ERSEA: Eligibility, Recruitment, Enrollment, and Attendance

Determining, Verifying, and Documenting Eligibility

Does the grantee enroll children or pregnant women who are categorically eligible or who meet defined income-eligibility requirements?

Monitoring Results:

- The grantee maintains child files with an eligibility record that includes the child's eligibility category, documentation that staff completed an in-person or telephone interview with the family, and the documents used to determine eligibility for each child or pregnant woman. 1302.12(k)
- The grantee enrolls children who are categorically eligible or who meet defined income-eligibility requirements. 1302.12(c)
- At least 10 percent of the grantee's total funded enrollment is filled by children eligible for services under the Individuals with Disabilities Education Act, or the grantee has received a waiver. 1302.14(b)

Attendance

Does the grantee monitor and use attendance data to support families in promoting individual child attendance and inform program improvements where monthly attendance rates indicate systematic attendance issues?

Monitoring Results:

- The grantee has a system for tracking child attendance and monitors individual child attendance and the program's monthly average daily attendance. 1302.16(a)(1); 1302.16(a)(2); 1302.16(b)

Enrollment

Does the grantee send accurate monthly enrollment numbers to the Head Start Enterprise System (HSES)?

Monitoring Results:

- The grantee reports accurate monthly enrollment numbers to HSES. 1302.15(a)



Program Highlights

Program highlights include information about your program's unique or innovative service delivery.

Supporting Teachers in Promoting School Readiness

The grantee, in order to improve school readiness, has instituted an annual staff recognition ceremony which takes place during pre-service. The categories for recognition include CLASS, attendance, family advocate and teacher of the year, volunteer hours, and professional development.

They implemented the process during the 2017 to 2018 program year. Pike County had the lowest Pre-K CLASS scores among the 64 Head Start classrooms. As a result of the new recognition program, Pike County improved their CLASS scores, child attendance, and parent volunteer hours. Four out of 10 of the Head Start classrooms were among the top 10 for recognition in the Pre-K CLASS category with internal average scores of 6.00 and above (out of 7.00) in all dimensions and domains. Three of the Pike County classrooms received recognition for the most volunteer hours, and 5 of their classrooms had the highest child attendance. The increase of parental involvement showed parents feel they can articulate what skills their children should work on at home, what their children are learning, and they felt more confident advocating for their children's education.

The impact of this approach has created better learning environments, a boost in teacher morale, team teaching cohesiveness, and parents have a better understanding of school readiness. Also, parents increased the number of volunteer hours in classrooms and attended more parent meetings, which involved parents more in their child's education and overall Head Start experience.