



June 23, 2010

TO: Yvette Sanchez Fuentes
Director, Office of Head Start
Administration for Children and Families

FROM: /George M. Reeb/
Acting Deputy Inspector General for Audit Services

SUBJECT: Review of Community Development Institute Head Start, North Metro DC,
Compliance With Health and Safety Regulations for Head Start Programs
(A-03-09-00361)

Attached, for your information, is an advance copy of our final report on Community Development Institute Head Start, North Metro DC's, compliance with health and safety regulations for Head Start programs. We will issue this report to Community Development Institute within 5 business days. The Administration for Children and Families, Office of Head Start, requested this review.

If you have any questions or comments about this report, please do not hesitate to call me, or your staff may contact Lori S. Pilcher, Assistant Inspector General for Grants, Internal Activities, and Information Technology Audits, at (202) 619-1175 or through email at Lori.Pilcher@oig.hhs.gov or Stephen Virbitsky, Regional Inspector General for Audit Services, Region III, at (215) 861-4470 or through email at Stephen.Virbitsky@oig.hhs.gov. Please refer to report number A-03-09-00361.

Attachment



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of Inspector General

Office of Audit Services, Region III
Public Ledger Building, Suite 316
150 S. Independence Mall West
Philadelphia, PA 19106-3499

June 25, 2010

Report Number: A-03-09-00361

Ms. Leann Earl
Project Director, National Interim Management Contract
Community Development Institute
10065 East Harvard Avenue, Suite 700
Denver, CO 80231

Dear Ms. Earl:

Enclosed is the U.S. Department of Health & Human Services (HHS), Office of Inspector General (OIG), final report entitled *Review of Community Development Institute Head Start, North Metro DC, Compliance With Health and Safety Regulations for Head Start Programs*. We will forward a copy of this report to the HHS action official noted on the following page for review and any action deemed necessary.

The HHS action official will make final determination as to actions taken on all matters reported. We request that you respond to this official within 30 days from the date of this letter. Your response should present any comments or additional information that you believe may have a bearing on the final determination.

Section 8L of the Inspector General Act, 5 U.S.C. App., requires that OIG post its publicly available reports on the OIG Web site. Accordingly, this report will be posted at <http://oig.hhs.gov>.

If you have any questions or comments about this report, please do not hesitate to call me, or contact Leonard Piccari, Audit Manager, at (215) 861-4693 or through email at Leonard.Piccari@oig.hhs.gov. Please refer to report number A-03-09-00361 in all correspondence.

Sincerely,

/Stephen Virbitsky/
Regional Inspector General
for Audit Services

Enclosure

Direct Reply to HHS Action Official:

Mr. David Lett
Regional Administrator
Administration for Children and Families, Region III
U.S. Department of Health & Human Services
Public Ledger Building, Suite 864
150 South Independence Mall West
Philadelphia, PA 19106

Department of Health & Human Services

**OFFICE OF
INSPECTOR GENERAL**

**REVIEW OF COMMUNITY
DEVELOPMENT INSTITUTE HEAD
START, NORTH METRO DC,
COMPLIANCE WITH HEALTH AND
SAFETY REGULATIONS FOR
HEAD START PROGRAMS**



Daniel R. Levinson
Inspector General

June 2010
A-03-09-00361

Office of Inspector General

<http://oig.hhs.gov>

The mission of the Office of Inspector General (OIG), as mandated by Public Law 95-452, as amended, is to protect the integrity of the Department of Health & Human Services (HHS) programs, as well as the health and welfare of beneficiaries served by those programs. This statutory mission is carried out through a nationwide network of audits, investigations, and inspections conducted by the following operating components:

Office of Audit Services

The Office of Audit Services (OAS) provides auditing services for HHS, either by conducting audits with its own audit resources or by overseeing audit work done by others. Audits examine the performance of HHS programs and/or its grantees and contractors in carrying out their respective responsibilities and are intended to provide independent assessments of HHS programs and operations. These assessments help reduce waste, abuse, and mismanagement and promote economy and efficiency throughout HHS.

Office of Evaluation and Inspections

The Office of Evaluation and Inspections (OEI) conducts national evaluations to provide HHS, Congress, and the public with timely, useful, and reliable information on significant issues. These evaluations focus on preventing fraud, waste, or abuse and promoting economy, efficiency, and effectiveness of departmental programs. To promote impact, OEI reports also present practical recommendations for improving program operations.

Office of Investigations

The Office of Investigations (OI) conducts criminal, civil, and administrative investigations of fraud and misconduct related to HHS programs, operations, and beneficiaries. With investigators working in all 50 States and the District of Columbia, OI utilizes its resources by actively coordinating with the Department of Justice and other Federal, State, and local law enforcement authorities. The investigative efforts of OI often lead to criminal convictions, administrative sanctions, and/or civil monetary penalties.

Office of Counsel to the Inspector General

The Office of Counsel to the Inspector General (OCIG) provides general legal services to OIG, rendering advice and opinions on HHS programs and operations and providing all legal support for OIG's internal operations. OCIG represents OIG in all civil and administrative fraud and abuse cases involving HHS programs, including False Claims Act, program exclusion, and civil monetary penalty cases. In connection with these cases, OCIG also negotiates and monitors corporate integrity agreements. OCIG renders advisory opinions, issues compliance program guidance, publishes fraud alerts, and provides other guidance to the health care industry concerning the anti-kickback statute and other OIG enforcement authorities.

Notices

THIS REPORT IS AVAILABLE TO THE PUBLIC

at <http://oig.hhs.gov>

Section 8L of the Inspector General Act, 5 U.S.C. App., requires that OIG post its publicly available reports on the OIG Web site.

OFFICE OF AUDIT SERVICES FINDINGS AND OPINIONS

The designation of financial or management practices as questionable, a recommendation for the disallowance of costs incurred or claimed, and any other conclusions and recommendations in this report represent the findings and opinions of OAS. Authorized officials of the HHS operating divisions will make final determination on these matters.

EXECUTIVE SUMMARY

BACKGROUND

Within the U.S. Department of Health & Human Services, the Administration for Children and Families, Office of Head Start (OHS), administers the Head Start and Early Head Start programs. We refer collectively to both programs as the Head Start program. In fiscal year (FY) 2009, Congress appropriated \$7.1 billion to fund the program's regular operations. The American Recovery and Reinvestment Act of 2009, P.L. No. 111-5 (Recovery Act), provides an additional \$2.1 billion for the Head Start program during FYs 2009 and 2010.

Community Development Institute Head Start, North Metro DC (the Grantee), provides a comprehensive child development program for eligible expectant families, children from birth to 5 years of age, and their families. The Grantee provides services to children at two facilities in the District of Columbia. For program year 2008–2009 (October 1, 2008, through September 30, 2009), OHS awarded approximately \$1.15 million in Federal Head Start funds to the Grantee to provide services to 158 children.

OBJECTIVE

Our objective was to determine whether the Grantee complied with applicable Federal and State requirements on ensuring the health and safety of children in its care.

SUMMARY OF FINDINGS

The Grantee did not fully comply with Federal and State requirements on ensuring the health and safety of children in its care. Specifically, as of June 2009:

- The files on all 19 of the Grantee's Head Start employees lacked (1) evidence of checks of the child protection register, (2) evidence of completed background checks, or (3) employee-signed declarations listing any relevant criminal convictions.
- The Grantee's two childcare facilities did not meet all Federal Head Start and State requirements on protecting children from unsafe materials and equipment.
- One of the Grantee's childcare facilities did not provide a secure environment for the children in its care.

These deficiencies occurred because the Grantee did not have adequate procedures or did not consistently follow procedures that were in place to ensure that it complied with Federal and State health and safety requirements. The Grantee's failure to comply with these requirements jeopardized the health and safety of children in its care.

RECOMMENDATIONS

We recommend that the Grantee develop and consistently implement procedures to ensure that:

- all employee files contain (1) evidence of checks of the child protection register, (2) evidence of completed background checks, and (3) employee-signed declarations listing any relevant criminal convictions;
- all unsafe materials and equipment are stored in locked areas out of the reach of children and other unsafe conditions are addressed; and
- all facilities are secure.

GRANTEE COMMENTS

In its comments on our draft report, the Grantee concurred with our recommendations and described its actions to address the deficiencies that we identified. The Grantee's comments are included as Appendix C. We have excluded the attachments accompanying the Grantee's comments because of their volume.

TABLE OF CONTENTS

	<u>Page</u>
INTRODUCTION	1
BACKGROUND	1
Federal Head Start Program.....	1
Federal Regulations for Head Start Grantees.....	1
Community Development Institute.....	1
Office of Inspector General Audits.....	2
OBJECTIVE, SCOPE, AND METHODOLOGY	2
Objective.....	2
Scope	2
Methodology.....	2
FINDINGS AND RECOMMENDATIONS	3
EMPLOYEE DECLARATIONS AND BACKGROUND CHECKS	3
Federal and State Requirements.....	3
Grantee’s Compliance With Federal and State Preemployment Requirements	4
MATERIAL AND EQUIPMENT SAFETY	4
Federal and State Requirements.....	4
Grantee’s Compliance With Material and Equipment Safety Requirements	5
FACILITY SECURITY	6
Federal and State Requirements.....	6
Grantee’s Compliance With Facility Security Requirements	6
INADEQUATE OR INCONSISTENTLY FOLLOWED PROCEDURES	6
RECOMMENDATIONS	7
GRANTEE COMMENTS	7
APPENDIXES	
A: LACK OF COMPLIANCE WITH MATERIAL AND EQUIPMENT SAFETY REGULATIONS	
B: LACK OF COMPLIANCE WITH FACILITY SECURITY REGULATIONS	
C: GRANTEE COMMENTS	

INTRODUCTION

BACKGROUND

Federal Head Start Program

Title VI of the Omnibus Budget Reconciliation Act of 1981 established Head Start as a Federal discretionary grant program. The major program objectives include promoting school readiness and enhancing the social and cognitive development of low-income children by providing health, educational, nutritional, and social services. In 1994, the Head Start program was expanded to establish Early Head Start, which serves children from birth to 3 years of age. We refer collectively to both programs as the Head Start program.

Within the U.S. Department of Health & Human Services, the Administration for Children and Families (ACF), Office of Head Start (OHS), administers the Head Start program. In fiscal year (FY) 2009, Congress appropriated \$7.1 billion to fund Head Start's regular operations.

The American Recovery and Reinvestment Act of 2009, P.L. No. 111-5 (Recovery Act), provides an additional \$2.1 billion for the Head Start program during FYs 2009 and 2010. These funds are intended for activities such as expanding enrollment, funding cost-of-living wage increases for grantees, upgrading centers and classrooms, and bolstering training and technical assistance.

Federal Regulations for Head Start Grantees

Pursuant to Federal Head Start regulations (45 CFR § 1304.53(a)(7)), Head Start grantees must provide for the maintenance, repair, safety, and security of all Head Start facilities. These regulations also specify that facilities used by Head Start grantees for regularly scheduled, center-based activities must comply with State and local licensing regulations. Alternatively, if State and local licensing standards are less stringent than the Head Start regulations or if no State licensing standards are applicable, grantees must ensure that their facilities comply with the Head Start Program Performance Standards related to health and safety (45 CFR § 1306.30(c)).

Community Development Institute

Community Development Institute Head Start, North Metro DC (the Grantee), provides a comprehensive child development program for eligible expectant families, children from birth to 5 years of age, and their families. Community Development Institute Head Start has been OHS's National Interim Management Contractor (NIC) for the Head Start program since September 29, 2000. As the NIC, Community Development Institute Head Start has operated 121 programs in 38 States to ensure continuity of services during the competitive selection of new Head Start grantees.

At the request of OHS, the Grantee is operating the Head Start program previously operated by Nation's Capital Child and Family Development of Washington, DC until a replacement grantee is secured. Since January 6, 2007, the Grantee has provided services to children at two licensed

facilities, the Dance Institute of Washington and the Azeze Bates Center, both located in the District of Columbia. For program year 2008–2009 (October 1, 2008, through September 30, 2009), OHS awarded approximately \$1.15 million in Federal Head Start funds to the Grantee to provide services to 158 children at the 2 facilities.

Office of Inspector General Audits

This audit is one of a series of audits that address the health and safety of children who attend Head Start programs. We are conducting these audits in response to the \$2.1 billion in Recovery Act funds appropriated for the Head Start program in FYs 2009 and 2010.

OBJECTIVE, SCOPE, AND METHODOLOGY

Objective

Our objective was to determine whether the Grantee complied with applicable Federal and State requirements on ensuring the health and safety of children in its care.

Scope

Our review covered the Grantee’s employee records and facilities as of June 2009. To gain an understanding of the Grantee’s operations, we conducted a limited review of the Grantee’s internal controls as they related to our audit objective.

We performed our fieldwork from June 1 through June 5, 2009, at the Grantee’s administrative office and at its two childcare facilities in the District of Columbia.

Methodology

To accomplish our objective, we:

- selected the Grantee based on prior risk analyses and discussions with ACF officials;
- reviewed Federal and State laws, regulations, and policies related to Federal grant awards and the Head Start program;
- reviewed the Grantee’s Head Start grant applications and current grant award documents;
- reviewed the Grantee’s files on all 19 current Head Start employees associated with the 2 facilities;¹
- reviewed the Grantee’s licenses and documentation of fire inspections;

¹ The 19 current employees were partially or fully funded by the Head Start grant award.

- visited the Grantee's 2 childcare facilities; and
- discussed our preliminary findings with Grantee and ACF officials.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

FINDINGS AND RECOMMENDATIONS

The Grantee did not fully comply with Federal and State requirements on ensuring the health and safety of children in its care. Specifically, as of June 2009:

- The files on all 19 of the Grantee's Head Start employees lacked (1) evidence of checks of the child protection register, (2) evidence of completed background checks, or (3) employee-signed declarations listing any relevant criminal convictions.
- The Grantee's two childcare facilities did not meet all Federal Head Start and State requirements on protecting children from unsafe materials and equipment.
- One of the Grantee's childcare facilities did not provide a secure environment for the children in its care.

These deficiencies occurred because the Grantee did not have adequate procedures or did not consistently follow procedures that were in place to ensure that it complied with Federal and State health and safety requirements. The Grantee's failure to comply with these requirements jeopardized the health and safety of children in its care.

EMPLOYEE DECLARATIONS AND BACKGROUND CHECKS

Federal and State Requirements

Federal Head Start regulations (45 CFR § 1301.31(b)(2)) state that grantees must require each current and prospective employee to sign a declaration that lists:

- all pending and prior criminal arrests and charges related to child sexual abuse and their disposition,
- convictions related to other forms of child abuse and neglect, and
- all convictions for violent crimes.

Pursuant to section 648A(g) of the Head Start Act (42 U.S.C. § 9843A(g)), a Head Start grantee may not hire an individual on a permanent or nonpermanent basis until it obtains (1) a State,

tribal, or Federal criminal record check covering all jurisdictions where the grantee provides Head Start services to children; (2) a State, tribal, or Federal criminal record check as required by the law of the jurisdiction where the grantee provides Head Start services; or (3) a criminal record check as otherwise required by Federal law.

In the District of Columbia, child development facilities must comply with the “Criminal and Background History Checks” requirements of the District of Columbia Municipal Regulations (29 DCMR § 328). Section 328.1 states that each employee must satisfactorily complete a criminal background check as required by the District of Columbia’s Child and Youth, Safety and Health Omnibus Amendment Act of 2004 (the Act). Section 328.1(a) also requires each employee to satisfactorily complete a child protection register check before he or she may be unconditionally employed. Section 4-1501.05(b)(1) of the Act states that “[a]n applicant, employee, or volunteer required to apply for a criminal background check under § 4-1501.03 shall submit to a criminal background check by means of fingerprint and National Criminal Information Center checks conducted by the Mayor and the FBI.”

Grantee’s Compliance With Federal and State Preemployment Requirements

The Grantee’s files on all 19 current employees² lacked evidence of compliance with 1 or more Federal or State preemployment requirements. Specifically:

- The files on 17 employees contained no evidence of a completed child protection register check.
- The files on six employees contained no evidence of a completed National Criminal Information Center background check, as required by District law.
- The file on one employee did not contain an employee-signed declaration listing all pending and prior criminal arrests and charges related to child sexual abuse, convictions related to other forms of child abuse and neglect, and convictions for violent crimes.

By not ensuring that all employees who supervised or had routine unsupervised contact with children met all preemployment requirements, the Grantee potentially jeopardized the safety of children in its care.

MATERIAL AND EQUIPMENT SAFETY

Federal and State Requirements

Pursuant to Federal Head Start regulations (45 CFR § 1304.53(a)(7)), grantees must provide for the maintenance, repair, and safety of all Head Start facilities, materials, and equipment. The regulations (45 CFR § 1304.53(a)(10)(iii)) require grantees to ensure that dangerous materials and potential poisons are stored in locked cabinets or storage facilities separate from stored medications and food and are accessible only to authorized persons. All medications, including

² The 19 employees included teachers, teacher assistants, family service workers, program aides, a family community partnership manager, a center director, a program director, and a fiscal specialist.

those required for staff and volunteers, must be labeled, stored under lock and key, refrigerated if necessary, and kept out of the reach of children.

Regulations (45 CFR § 1304.53(a)(10)(v)) require grantees to ensure that approved, working fire extinguishers are readily available. In addition, 45 CFR § 1304.53(a)(10)(vi) states that grantees must ensure that an appropriate number of smoke detectors are installed and tested regularly. Pursuant to 45 CFR § 1306.30(c), grantees also must ensure that Head Start facilities comply with any State and local licensing requirements. If these licensing standards are less comprehensive or less stringent than Head Start regulations or if no State or local licensing standards are applicable, grantees must ensure that their facilities comply with the Head Start Program Performance Standards related to health and safety.

State regulations (29 DCMR §§ 363 and 369) require, among other things, that:

- unused electrical outlets that are within the reach of children be fitted with appropriate child-proof protective closures;
- cleaning and sanitizing supplies, toxic substances, paints, poisons, aerosol containers, and other items bearing warning labels be safely stored and kept inaccessible to children; and
- first aid supplies be readily available to staff and inaccessible to children.

State regulations (29 DCMR § 305) also require that each child development center undergo an annual fire safety inspection and obtain certification that the premises conform to all applicable fire safety and related codes. The certification must be issued by the Department of Fire and Emergency Medical Services or the Department of Consumer and Regulatory Affairs upon each annual application for license renewal.

Grantee's Compliance With Material and Equipment Safety Requirements

The Grantee's childcare facilities did not meet all Federal Head Start and State health and safety requirements on protecting children from unsafe materials and equipment. Our visits to the Dance Institute of Washington on June 1 and 2 and to the Azeze Bates Center on June 2 and 3 found the following deficiencies, which we immediately reported to the facility managers on duty and received assurance that the facilities would correct:

- At the Dance Institute of Washington, fire extinguishers were stored within reach of children (Appendix A, Photograph 1).
- At both facilities, first aid kits were easily accessible to children (Appendix A, Photograph 1).
- The Dance Institute of Washington provided no evidence that smoke detectors were tested on a regular basis.

- At both facilities, a total of seven electrical outlets accessible to children lacked protective closures (Appendix A, Photograph 2).
- At the Dance Institute of Washington, chemicals and cleaning supplies were stored in unlocked cabinets or closets within children’s reach (Appendix A, Photograph 3).
- At the Azeeze Bates Center, a fire inspection approval certification dated May 1, 2008, had expired.

By not ensuring that all facilities were kept free from unsafe materials and equipment, the Grantee jeopardized the safety of children in its care.

FACILITY SECURITY

Federal and State Requirements

Pursuant to 45 CFR § 1304.53(a)(7), grantees must provide for the security of all Head Start facilities. Pursuant to 45 CFR § 1306.30(c), grantees also must ensure that Head Start facilities comply with any State and local licensing requirements. If these licensing standards are less comprehensive or less stringent than Head Start regulations or if no State or local licensing standards are applicable, grantees must ensure that their facilities comply with the Head Start Program Performance Standards related to health and safety.

State regulations (29 DCMR § 342) require that an outdoor play area be in an enclosed yard on the facility premises, in a nearby park or playground, or in a rooftop play space that meets State safety standards. The facility must maintain the outdoor play space so that it is free from conditions that are, or might be, hazardous to the health and safety of children.

Grantee’s Compliance With Facility Security Requirements

The outdoor play area at the Azeeze Bates Center was not enclosed by a fence or natural barrier that would prevent children from leaving the premises and entering unsafe and unsupervised areas. The play area was open to the parking area in front of an apartment complex and therefore accessible to strangers (Appendix B, Photograph 1). We reported this issue to the facility manager, who replied that the facility would use another play area, a public school playground located a few blocks from the building, instead.

By not ensuring that the outdoor play area was secure, the Grantee jeopardized the safety of children in its care.

INADEQUATE OR INCONSISTENTLY FOLLOWED PROCEDURES

These deficiencies occurred because the Grantee did not have adequate procedures or did not consistently follow procedures that were in place to ensure that it complied with Federal and State health and safety requirements.

RECOMMENDATIONS

We recommend that the Grantee develop and consistently implement procedures to ensure that:

- all employee files contain (1) evidence of checks of the child protection register, (2) evidence of completed background checks, and (3) employee-signed declarations listing any relevant criminal convictions;
- all unsafe materials and equipment are stored in locked areas out of the reach of children and other unsafe conditions are addressed; and
- all facilities are secure.

GRANTEE COMMENTS

In its comments on our draft report, the Grantee concurred with our recommendations and described its actions to address the deficiencies that we identified. The Grantee's comments are included as Appendix C. We have excluded the attachments accompanying the Grantee's comments because of their volume.

APPENDIXES

**APPENDIX A: LACK OF COMPLIANCE WITH
MATERIAL AND EQUIPMENT SAFETY REGULATIONS**



Photograph 1 – Taken at the Dance Institute of Washington on 6/1/2009 showing a first aid kit and a fire extinguisher within reach of children.



Photograph 2 – Taken at the Azeze Bates Center on 6/2/2009 showing an uncovered electrical outlet in the children's play area.



Photograph 3 – Taken at the Dance Institute of Washington on 6/1/2009 showing a container of bleach in an unlocked room.

**APPENDIX B: LACK OF COMPLIANCE WITH
FACILITY SECURITY REGULATIONS**



Photograph 1 – Taken at the Azeze Bates Center on 6/3/2009 showing the onsite play area with no fence or natural barrier preventing access to a parking area.

APPENDIX C: GRANTEE COMMENTS



Community Development Institute Head Start

National Interim Management Contract
10065 E. Harvard Avenue, Suite 700
Denver, CO 80231
(877) 789-4900 * Fax (720) 747-5148

May 12, 2010

Deborah Walsh
Office of Audit Services
Office of Inspector General
U.S. Department of Health and Human Services

Thank you for the opportunity to respond to the findings of your June 2009 on site inspection of our Community Development Institute Head Start Serving North Metro DC program. The North Metro DC Head Start program provides a comprehensive child development program for eligible families, children from 3-5 years of age. These services are provided at two facilities; Azeeze-Bates, located at 444 16th St. NE and 3400-A 14th St. NW.

This report will respond to the Summary of Findings listed below:

1. The files on all 19 of the Grantee's Head Start employees lacked (1) evidence of checks of the child protection register, (2) evidence of completed background checks, or (3) employee-signed declarations listing any relevant criminal convictions.
2. The Grantee's two childcare facilities did not meet all Federal Head Start and State requirements on protecting children from unsafe materials and equipment.
3. One of the Grantee's childcare facilities did not provide a secure environment for the children in its care.

This report will also demonstrate compliance with all recommendations of the US Department of Health and Human Services, Office of the Inspector General.

1. All employee files contain (1) evidence of checks of the child protective register, (2) evidence of completed background checks, and (3) employee-signed declarations listing any relevant criminal convictions
2. All unsafe materials and equipment are stored in locked areas out of the reach of children and other unsafe conditions are addressed; and
3. All facilities are secure.

RESPONSE TO FINDINGS and RECOMMENDATIONS: EMPLOYEE DECLARATIONS AND BACKGROUND CHECKS

Finding (1)

The files on all 19 of the Grantee's Head Start employees lacked (1) evidence of checks of the child protection register, (2) evidence of completed background checks, or (3) employee-signed declarations listing any relevant criminal convictions.

Recommendation (1)

All employee files contain (1) evidence of checks of the child protective register, (2) evidence of completed background checks, and (3) employee-signed declarations listing any relevant criminal convictions

Response (1)

CDI HS concurs with this finding and recommendation. The following corrective action was taken immediately:

1. The 2007 CDI Employee Handbook, Section D (3),(4) requires each program to conduct criminal records checks in accordance with local state law and each employee is required to sign an arrest and conviction declaration (Please see attached item #1 and #1A).
2. CDI HS also has a policy which requires all employees to undergo a criminal record check prior to any type of employment (irrespective of whether such employees are considered temporary, on probation or other personnel category). These checks must be completed with results obtained and reviewed to determine compliance with federal and local state standards prior to the employee's first day of work. (Please see attached item #2)
3. The human resources specialist follows a strict protocol for hiring new persons. Staff use a Personnel File Checklist when processing new hires. Following this checklist is another means of ensuring that all required paperwork is completed (Please see attached Item #3).
4. Staff responsible for oversight of this area have been retrained and are closely monitored to ensure compliance. Onsite checks have been conducted to ensure compliance and as such our internal audit findings are that staff is complying with this standard.

MATERIAL AND EQUIPMENT SAFETY

Finding (2)

The Grantee's two childcare facilities did not meet all Federal Head Start and State requirements on protecting children from unsafe materials and equipment.

Recommendation (2)

All unsafe materials and equipment are stored in locked areas out of the reach of children and other unsafe conditions are addressed.

Response (2)

CDI HS concurs with this finding and recommendation. The following corrective action was taken immediately:

1. CDI HS Serving North Metro DC revised and redistributed safety policies and retrained staff on the proper procedures to ensure safety. The policy which covers classroom/facility safety is attached as item #4. Center Directors have been retrained and/or replaced and are continuously monitored by management team members. If there are items of concern or issues of non-compliance in any area, it is immediately brought to the attention of the Center Director who will take corrective action on the spot. If an issue requires a more advanced approach such as repair, then a work order is submitted. The damaged or "in need of repair" item is removed from the classroom or blocked from children until said repairs can be made.
2. Fire Extinguishers stored out of reach of children: All classrooms have been checked and fire extinguishers have been secured out of reach of children (see attached photo item #5).
3. First aid kits easily accessible to staff but out of reach of children: All classrooms were immediately checked and first aid kits were secured out of reach of children (see attached photo item #6).

4. Dance Institute of Washington smoke detectors checked on a regular basis: The annual inspection was completed on July 30th. In addition, the program uses checklists, #567 and #570, that ensure smoke detectors are checked. (See attached items #7, 7A and 7B)
5. Electrical outlets are checked and installed with protective closures: All unused electrical outlets have child resistant plastic protective closures. These protective closures are checked daily at the beginning of the day and periodically throughout the day. Each morning one of the teaching staff will conduct a health and safety check of their classroom using a Daily Health & Safety Checklist, which is reviewed at least weekly by the Center Director (Please see attached item #8). All staff have been retrained on the above procedure and are closely monitored.
6. Dance Institute of Washington chemicals and cleaning supplies are stored in locked cabinets. The program staff store all unsafe materials and equipment in locked cabinets or closets that are inaccessible to children (please see attached photo item #9). All staff have been retrained on the above procedure and are closely monitored.
7. Azeeze Bates Center – a fire inspection approval certificate is dated 8/13/09. (Please see attached item #10)

FACILITY SECURITY

Finding (3)

One of the Grantee's childcare facilities did not provide a secure environment for the children in it's care.

Recommendation (3)

All facilities are secure.

Response (3)

CDI HS concurs with this finding and recommendation. The following corrective action was taken immediately:

1. The children of the Azeeze Bates Center utilize the enclosed Minor Elementary School playground which is two blocks from the Azeeze-Bates Center.
2. Additionally CDI Head Start has invested funds in the creation of a totally enclosed play area in the back of the Azeeze-Bates Center. We constructed a seven foot concrete and brick wall with a steel door (Please see attached photo items 11 & 12). This will decrease the possibility of neighborhood incidents, provide teachers the opportunity to manipulate the environment to meet the ever changing needs of the center and further contain activities to the center.

Sincerely,



Leann Earl
Project Director