

Office of Inspector General

Washington, D.C. 20201

July 7, 2010

ГО:	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 Northcott Neighborhood House's Compliance With Health and Safety Regulations for Head Start Programs (A-05-09-00079)

Attached, for your information, is an advance copy of our final report on Northcott Neighborhood House's (the Grantee) compliance with health and safety regulations for Head Start programs. We will issue this report to the Grantee 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 James C. Cox, Regional Inspector General for Audit Services, Region V, at (312) 353-2621 or through email at James.Cox@oig.hhs.gov. Please refer to report number A-05-09-00079.

Attachment



Office of Inspector General

Office of Audit Services, Region V 233 North Michigan Avenue Suite 1360 Chicago, IL 60601

July 12, 2010

Report Number: A-05-09-00079

Ms. M. Francis Martin Director Northcott Neighborhood House 2460 North Sixth Street Milwaukee, WI 53212

Dear Ms. Martin:

Enclosed is the U.S. Department of Health & Human Services (HHS), Office of Inspector General (OIG), final report entitled *Review of Northcott Neighborhood House's 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 <u>http://oig.hhs.gov</u>.

If you have any questions or comments about this report, please do not hesitate to call me, or contact Mike Barton, Audit Manager, at (614) 469-2543 or through email at <u>Mike.Barton@oig.hhs.gov</u>. Please refer to report number A-05-09-00079 in all correspondence.

Sincerely,

/James C. Cox/ Regional Inspector General for Audit Services

Enclosure

Direct Reply to HHS Action Official:

Mr. Kent Wilcox Regional Administrator Administration for Children and Families U.S. Department of Health & Human Services 233 North Michigan Avenue, Suite 400 Chicago, IL 60601-5519 Department of Health & Human Services

OFFICE OF INSPECTOR GENERAL

REVIEW OF NORTHCOTT NEIGHBORHOOD HOUSE'S COMPLIANCE WITH HEALTH AND SAFETY REGULATIONS FOR HEAD START PROGRAMS



Daniel R. Levinson Inspector General

> July 2010 A-05-09-00079

Office of Inspector General

http://oig.hhs.gov

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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.

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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.

Northcott Neighborhood House (the Grantee), a Head Start delegate agency, provides early learning services to children aged 3 to 5 years and their families through a comprehensive educational program at three facilities in Milwaukee, Wisconsin. For the grant year November 1, 2008, through October 31, 2009, OHS awarded approximately \$1.6 million in Federal Head Start funds to the Grantee to provide services to 318 children. On May 7, 2009, the Grantee requested \$29,184 in Recovery Act funding.

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 May 2009:

- The Grantee could not provide any evidence that its two contracted busdrivers had received driving record checks, preemployment medical examinations, or required training.
- The Grantee's three childcare facilities did not meet all Federal Head Start and State regulations on protecting children from unsafe materials and equipment and providing a secure environment for children.

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 regulations. The Grantee's failure to comply with these regulations jeopardized the health and safety of children in its care.

RECOMMENDATIONS

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

- if it resumes transportation services, all Federal requirements related to busdriver qualifications and training are met and documented and
- all unsafe materials and equipment are stored in locked areas out of the reach of children, all necessary repairs are addressed in a timely manner, and all facilities are secure.

GRANTEE COMMENTS

In written comments on our draft report, the Grantee agreed with our recommendations and stated that all material and equipment safety and facility security findings identified during our visits had been corrected. However, the Grantee disagreed that children were using the Sixth Street gymnasium during our visit because repairs were underway and drywall was being temporarily stored in the gymnasium. The Grantee also disagreed that two fire extinguishers at the same facility had expired tags.

The Grantee's comments are included in their entirety as Appendix B.

OFFICE OF INSPECTOR GENERAL RESPONSE

During our visit to the Sixth Street facility, we observed children playing in the gymnasium with broken drywall and debris on the floor. Although the majority of fire extinguishers at the facility were inspected shortly before our visit, two fire extinguishers in an exit hallway near the gymnasium had expired tags.

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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 and State 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)).

In Wisconsin, childcare facilities must comply with Wisconsin Administrative Code DCF 251— Licensing Rules for Group Child Care Centers unless an exception to a particular requirement is granted (DCF 251.02).

Northcott Neighborhood House

Northcott Neighborhood House (the Grantee), a Head Start delegate agency,¹ provides early learning services to children aged 3 to 5 years and their families through a comprehensive educational program that focuses on activities such as pre-math education, music, dramatic play,

¹ The Social Development Commission (SDC), a Head Start grantee, delegated part of the responsibility for operating the Head Start program to Northcott Neighborhood House.

fine and gross motor skills, multicultural activities, preliteracy education, creative art, socialization, field trips, mental health, and nutrition. The Grantee serves children and families in Milwaukee, Wisconsin, at three State-licensed locations: Sixth Street, Lisbon Avenue, and Fond du Lac Avenue.

For the grant year November 1, 2008, through October 31, 2009, OHS awarded approximately \$1.6 million in Federal Head Start funds to the Grantee to provide services to 318 children. On May 7, 2009, the Grantee requested \$29,184 in Recovery Act funding.²

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 May 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 May 18 through May 20, 2009, at the Grantee's administrative office and its three childcare facilities in Milwaukee, Wisconsin.

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 application and current grant award documents;

² On July 10, 2009, SDC received more than \$1.4 million in Recovery Act funding. Because of Northcott's delegate agency relationship with SDC, we could not determine when Northcott received its portion of the funds.

- reviewed the Grantee's files on all 41 current Head Start employees;³
- reviewed the Grantee's licenses and documentation of fire inspections;
- visited the Grantee's three 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 May 2009:

- The Grantee could not provide any evidence that its two contracted busdrivers had received driving record checks, preemployment medical examinations, or required training.
- The Grantee's three childcare facilities did not meet all Federal Head Start and State regulations on protecting children from unsafe materials and equipment and providing a secure environment for children.

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 regulations. The Grantee's failure to comply with these regulations jeopardized the health and safety of children in its care.

HEAD START BUSDRIVER QUALIFICATIONS AND TRAINING

Federal Regulations

Pursuant to Federal Head Start regulations (45 CFR § 1310.16(b)), a grantee's applicant review procedure for busdrivers must include, at a minimum, (1) a review of general grantee staff qualifications with additional disclosure by the applicant of all moving traffic violations, regardless of penalty;⁴ (2) a check of the applicant's driving record through the appropriate State agency, including a check of the applicant's record through the National Driver Register, if

³ The 41 current employees were partially or fully funded by the Head Start grant award.

⁴ The general qualifications for a grantee's staff are specified in 45 CFR § 1304.52(b).

available in the State; and (3) a medical examination by a licensed doctor of medicine or osteopathy, after a conditional offer of employment and before the applicant begins work, establishing that the individual is physically able to perform job-related functions with any necessary accommodations. The regulations (45 CFR § 1310.17(b)) also require that each grantee providing transportation services ensure that busdrivers receive a combination of classroom instruction and behind-the-wheel instruction before transporting children.

In addition, 45 CFR § 1310.10(c) states that each grantee that provides transportation services is responsible for complying with the applicable requirements of 45 CFR § 1310. When a grantee provides transportation through another organization or an individual, the grantee must ensure that the transportation provider complies with these requirements.

Grantee's Compliance With Federal Regulations

The Grantee contracted for two busdrivers to provide Head Start transportation services. Because the busdrivers were employees of the contractor, the Grantee did not maintain any documentation on them. The Grantee's files contained no evidence that a driving record check was conducted during the applicant review process, that a medical examination was conducted before employment, or that classroom and behind-the-wheel instruction was provided before the two drivers were allowed to transport children. We discussed these deficiencies with Grantee officials, and they informed us that they terminated the transportation services shortly after our visit.

These deficiencies occurred because Grantee policies did not require monitoring the transportation provider to ensure that it complied with Federal and State regulations. By not ensuring that Head Start busdrivers had adequate qualifications and met mandatory training requirements before transporting children, the Grantee potentially jeopardized the health and safety of children in its care.

MATERIAL AND EQUIPMENT SAFETY AND FACILITY SECURITY

Federal and State Regulations

Pursuant to Federal Head Start regulations (45 CFR § 1304.53(a)(7)), grantees must provide for the maintenance, repair, safety, and security of all Head Start facilities, materials, and equipment. The regulations (45 CFR § 1304.53(a)(10)) state that as part of the safety inspections that are required to be conducted at least annually, grantees must ensure that approved, working fire extinguishers are readily available. Also, 45 CFR § 1304.53(a)(9) states that the Head Start physical environment and outdoor play areas at center-based programs must be arranged so as to prevent any child from leaving the premises and entering unsafe and unsupervised areas. Further, 45 CFR § 1304.53(a)(10)(vii) requires that grantees ensure that exits are clearly visible so that the path to safety outside is unmistakable.

Pursuant to 45 CFR § 1306.30(c), grantees 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.

In Wisconsin, childcare facilities must comply with Wisconsin Administrative Code DCF 251— Licensing Rules for Group Child Care Centers. DCF 251.06(2)(d) states that materials harmful to children, including power tools, flammable or combustible materials, insecticides, matches, drugs, and other articles hazardous or poisonous to children must be stored in properly marked containers in areas inaccessible to children. DCF 251.06(4)(d) states that exits and exit passageways must have a minimum clearance of 3 feet and be unobstructed by furniture or other objects.

Grantee's Compliance With Federal and State Regulations

The Grantee's childcare facilities did not meet all Federal Head Start and State health and safety regulations on protecting children from unsafe materials and equipment and ensuring facility security. We noted deficiencies at all three facilities and reported the deficiencies to Grantee officials. The officials agreed to address these issues in a timely manner.

Sixth Street (visited May 19, 2009)

- A classroom drawer had a sharp metal edge within reach of children (Appendix A, Photograph 1).
- The door to the faculty lounge was unlocked, allowing children access to a gas stove (Appendix A, Photograph 2).
- A gymnasium where children routinely played had large pieces of broken drywall and debris on the floor (Appendix A, Photograph 3).
- Two fire extinguishers in an exit hallway had expired tags (last serviced in September 1991).
- An exit passageway off the gymnasium contained a shopping cart, cleaning mops, a snow shovel, and other objects that obstructed the exit (Appendix A, Photographs 4 and 5).

Lisbon Avenue (visited May 20, 2009)

- An unlocked stairwell contained paint and cleaning supplies within reach of children (Appendix A, Photograph 6).
- The door leading to the hallway and exterior door lacked an exit sign.

Fond du Lac Avenue (visited May 20, 2009)

• An approximately 6-inch-wide gap in the playground fence could have permitted a child to leave the premises and enter an unsupervised alley and roadway (Appendix A, Photograph 7).

These deficiencies occurred because the Grantee did not consistently follow procedures that were in place to ensure that it complied with Federal and State health and safety regulations. By not ensuring that all facilities were kept free from unsafe materials and equipment and that all facilities were secure, the Grantee jeopardized the safety of children in its care.

RECOMMENDATIONS

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

- if it resumes transportation services, all Federal requirements related to busdriver qualifications and training are met and documented and
- all unsafe materials and equipment are stored in locked areas out of the reach of children, all necessary repairs are addressed in a timely manner, and all facilities are secure.

GRANTEE COMMENTS

In written comments on our draft report, the Grantee agreed with our recommendations and stated that all material and equipment safety and facility security findings identified during our visits had been corrected. However, the Grantee disagreed that children were using the Sixth Street gymnasium during our visit because repairs were underway and drywall was being temporarily stored in the gymnasium. The grantee also disagreed that two fire extinguishers at the same facility had expired tags.

The Grantee's comments are included in their entirety as Appendix B.

OFFICE OF INSPECTOR GENERAL RESPONSE

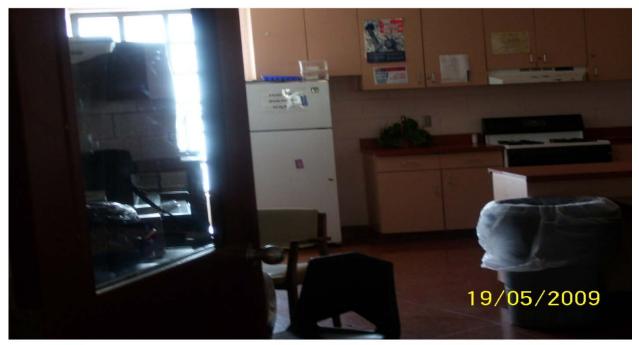
During our visit to the Sixth Street facility, we observed children playing in the gymnasium with broken drywall and debris on the floor. Although the majority of fire extinguishers at the facility were inspected shortly before our visit, two fire extinguishers in an exit hallway near the gymnasium had expired tags.

APPENDIXES

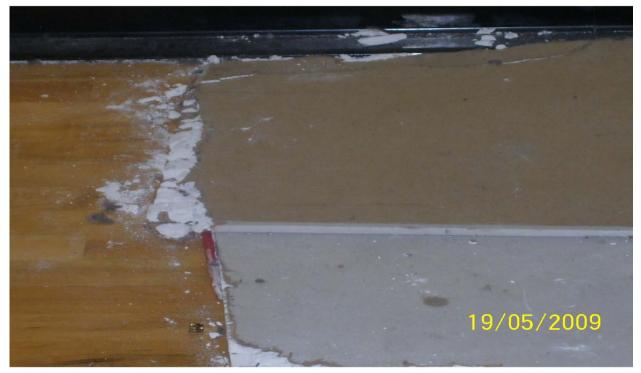
APPENDIX A: LACK OF COMPLIANCE WITH MATERIAL AND EQUIPMENT SAFETY AND FACILITY SECURITY REGULATIONS



Photograph 1 – Taken at Sixth Street on 5/19/09 showing the sharp metal edge of a classroom drawer.



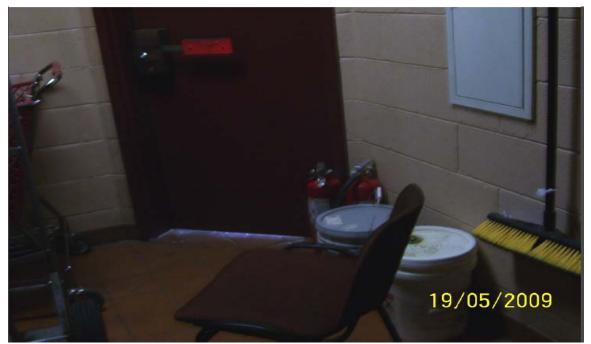
Photograph 2 – Taken at Sixth Street on 5/19/09 showing the unlocked faculty lounge with a gas stove.



Photograph 3 – Taken at Sixth Street on 5/19/09 showing broken drywall and debris on the floor of a gymnasium where children routinely played.



Photograph 4 – Taken at Sixth Street on 5/19/09 showing objects obstructing an exit passageway.



Photograph 5 – Taken at Sixth Street on 5/19/09 showing the same obstructed passageway as in Photograph 4 and the exit (the door with the red sign).



Photograph 6 – Taken at Lisbon Avenue on 5/20/09 showing paint and cleaning supplies in an unlocked stairwell.



Photograph 7 – Taken at Fond du Lac Avenue on 5/20/09 showing an approximately 6-inch-wide gap in the playground fence.

M. FRANCES MARTIN Director

APPENDIX B: GRANTEE COMMENTS



Northcott Head Start

2460 North 6th Street Milwaukee, Wisconsin 53212 Telephone (414) 372-3770 • Fax (414) 372-3619

April 28, 2010

REPORT NUMBER: A-05-09-00079

Mr. James C. Cox Regional Inspector General for Audit Services 233 North Michigan Avenue Suite 1360 Chicago, Illinois 60601

Dear Mr. Cox:

I am writing this letter in response to the draft report received on April 26, 2010 regarding the health and safety audit visit conducted on May 19 and 20, 2009.

Grantee's Compliance with Federal and State Regulations

Regarding the transportation findings, if in the future the agency is able to provide transportation, we will ensure that contracted vendors comply with the transportation regulations as outlined in 45CFR 1310. As of the 2009-2010 school year transportation is not provided.

All material and equipment safety and facility security findings identified during the visit were corrected:

Sixth Street (visited May 19, 2009)

A new file cabinet was purchased for the classroom (Appendix, Photograph 1) (See corrected Photograph 1)

The door to the small kitchen is locked at all times when not in use for meetings or other agency activities so that children do not have access to the gas stove. (Appendix, Photograph 2) (See corrected Photograph 2)

The large piece of broken drywall and debris on the floor of the gym were removed. (Appendix, Photograph 3) (See corrected Photograph 3)

RESPONSE: Children were not using the gym during the week of the visit as there were some maintenance repairs being done and the dry wall was stored in the gym on a temporary basis until the bathroom repairs were done.

Two fire extinguishers in an exit hallway had expired tags (last serviced in September 1991)

RESPONSE: Fire extinguishers at all three sites are serviced annually. The last service date for 6th Street site before the visit was March 4, 2009 which is documented in our files. (See attached invoice Accurate Recharge & Fire Suppression)

All items that obstructed the exit and an exit passageway off the gym were removed. (Appendix, Photographs 4 and 5) (See corrected Photographs 4 and 5)

Lisbon Avenue Center (visited May 20, 2009)

All paint and cleaning supplies were removed and the door to the stairwell is locked daily. (Appendix Photograph 6) (See corrected Photograph 6)

Exit signs were posted on the door leading to the hallway and exterior door.

Fond du Lac Center (visited May 20, 2009)

The gap in the playground fence has been enclosed. (Appendix Photograph 7) (See corrected Photograph 7)

It is the goal of all employees to ensure that the children in our care are safe and our sites are free from any hazardous conditions or equipment.

Please note that all issues (except for the fence, because new fencing had to be purchased to close the gap permanently) were resolved within 24 hours of notification to the Director and was reported to the monitors at the exit meeting on May 20, 2009.

Other actions that were taken based on your recommendations:

Director met with site managers to reinforce the importance of diligently monitoring the facilities to ensure that none of the issues cited will ever occur again.

Agency on-going monitoring procedures have been reviewed and changes will be made for next year to ensure that the health and safety checklists are done monthly and reviewed by the Director.

Agency managers will ensure that all unrestricted areas are secured and are not accessible to the children.

Northcott Neighborhood House has sponsored the Head Start program since its inception in 1965 working under the auspices of the grantee, Social Development Commission. We have always prided ourselves with providing the best possible services to the children and families. We have and will continue to put forth every effort to be in compliance with the Federal regulations governing Head Start to ensure the safety of the children in our care.

Sincerely,

M. Frances Martin Head Start Director

Enclosures

APPENDIX

Sixth Street—Corrected Photographs



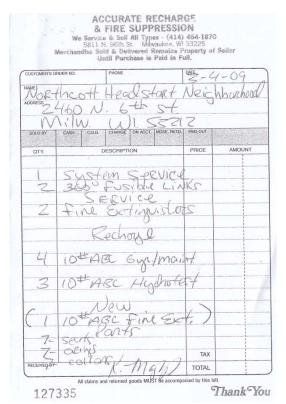
4/28/10 Corrected Photograph 1-- New File Cabinet



4/28/10 Corrected Photograph 2—Small kitchen door locked



4/28/10 Corrected Photograph 3—Drywall and debris removed



Attachment—Accurate Recharge & Fire Suppression Service Invoice



4/28/10 Corrected Photograph 4 exit passageway off gym



4/28/10 Corrected Photograph 5 passageway

Lisbon Center





4/28/10 Corrected Photograph 6—paint cans and cleaning supplies removed

4/28/10 Corrected Photograph –exit signs posted

Fond Du Lac Center



Corrected photograph 7-gap in fence enclosed