



Washington, D.C. 20201

September 16, 2010

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

**FROM:** /Joe J. Green/ for  
George M. Reeb  
Acting Deputy Inspector General for Audit Services

**SUBJECT:** Review of Community Council of South Central Texas, Inc.'s Compliance With  
Health and Safety Regulations for Head Start Programs (A-06-09-00081)

Attached, for your information, is an advance copy of our final report on Community Council of South Central Texas, Inc.'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](mailto:Lori.Pilcher@oig.hhs.gov) or Patricia Wheeler, Regional Inspector General for Audit Services, Region VI, at (214) 767-8414 or through email at [Patricia.Wheeler@oig.hhs.gov](mailto:Patricia.Wheeler@oig.hhs.gov). Please refer to report number A-06-09-00081.

Attachment



Office of Audit Services, Region VI  
1100 Commerce Street, Room 632  
Dallas, TX 75242

September 21, 2010

Report Number: A-06-09-00081

Mr. Robert Lucio  
Executive Director  
Community Council of South Central Texas, Inc.  
205A East Court Street  
Seguin, TX 78155

Dear Mr. Lucio:

Enclosed is the U.S. Department of Health & Human Services (HHS), Office of Inspector General (OIG), final report entitled *Review of Community Council of South Central Texas, Inc.'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 <http://oig.hhs.gov>.

If you have any questions or comments about this report, please do not hesitate to call me, or contact Sylvie Witten, Audit Manager, at (512) 339-3071 or through email at [Sylvie.Witten@oig.hhs.gov](mailto:Sylvie.Witten@oig.hhs.gov). Please refer to report number A-06-09-00081 in all correspondence.

Sincerely,

/Antonio Wilkinson/ for  
Patricia Wheeler  
Regional Inspector General  
for Audit Services

Enclosure

**Direct Reply to HHS Action Official:**

Mr. Leon R. McCowan  
Regional Administrator, Region VI  
Administration for Children and Families  
U.S. Department of Health & Human Services  
1301 Young Street, Room 914  
Dallas, TX 75202-5433

Department of Health & Human Services

**OFFICE OF  
INSPECTOR GENERAL**

**REVIEW OF COMMUNITY  
COUNCIL OF SOUTH CENTRAL  
TEXAS, INC.'S COMPLIANCE  
WITH HEALTH AND SAFETY  
REGULATIONS FOR  
HEAD START PROGRAMS**



Daniel R. Levinson  
Inspector General

September 2010  
A-06-09-00081

# *Office of Inspector General*

<http://oig.hhs.gov>

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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:

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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.

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# *Notices*

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## **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 Council of South Central Texas, Inc. (the Grantee), is a nonprofit organization with headquarters in Seguin, Texas. The Grantee’s goal is to alleviate poverty by providing programs for the elderly and for low-income individuals and families. The Grantee operates a Head Start program at seven State-licensed facilities in the south central Texas area. For program year November 1, 2009, to October 31, 2010, OHS awarded approximately \$2.2 million in Federal Head Start funds to the Grantee to provide services to 326 children. On July 1, 2009, the Grantee also received \$161,981 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 December 2009:

- The files on the Grantee’s 85 employees and contractors contained evidence of the required background checks. However, the Grantee did not always request these checks when they were due.
- Four of the six Grantee childcare facilities that we visited did not meet all Federal Head Start and State requirements on protecting children from unsafe materials and equipment.
- Two of the six Grantee childcare facilities that we visited did not provide a fully secure environment for the children in their 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 follow these requirements jeopardized the health and safety of children in its care.

## **RECOMMENDATIONS**

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

- required background checks are completed when due,
- all unsafe conditions are corrected and all necessary repairs are addressed in a timely manner, and
- all facilities are secure.

## **GRANTEE COMMENTS AND OFFICE OF INSPECTOR GENERAL RESPONSE**

In written comments on our draft report, the Grantee described actions that it had taken or planned to take to address the deficiencies that we identified. Specifically, the Grantee stated that initial background checks and Federal Bureau of Investigation fingerprinting would be conducted before hiring new employees and that background checks would be repeated every 24 months from the hire date. Furthermore, the Grantee said that it had implemented action plans to correct some of the reported material and equipment deficiencies and that it intended to implement plans to correct the remaining deficiencies by September 7, 2010.

The Grantee disagreed with our finding that an open bucket of bleach solution was stored on a food cart before meals were served at Comal No. 1. The Grantee said that bleach was kept in spray bottles and was not present on the food cart at the time of our review. The Grantee's comments are included in their entirety as Appendix B.

Kitchen staff at Comal No. 1 told us that one of the buckets shown in Appendix A, Photograph 3, contained a bleach/water solution that was used to wipe tables after meals.



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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 Requirements 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 Texas, childcare centers must comply with the Texas Administrative Code, Title 40, part 19, chapters 745 and 746, and the Texas Human Resources Code, chapter 42.

#### **Community Council of South Central Texas, Inc.**

Community Council of South Central Texas, Inc. (the Grantee), is a nonprofit organization with headquarters in Seguin, Texas. The Grantee’s goal is to alleviate poverty by providing programs for the elderly and for low-income individuals and families. The Grantee operates a Head Start program at seven State-licensed facilities in the south central Texas area. For program year November 1, 2009, to October 31, 2010, OHS awarded approximately \$2.2 million in Federal Head Start funds to the Grantee to provide services to 326 children. On July 1, 2009, the Grantee also received \$161,981 in Recovery Act funding.

## **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, facilities, and transportation program as of December 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 on December 16 and 17, 2009, at the Grantee's administrative office in Seguin, Texas, and at six of its seven childcare facilities in the Texas towns of Cibolo, Marion, New Braunfels, and Seguin.<sup>1</sup>

#### **Methodology**

To accomplish our objective, we:

- selected the Grantee based on prior risk analyses and discussions with ACF officials;
- reviewed Federal and State laws, requirements, 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 85 current Head Start employees and individuals under contract with the Grantee (contractors);<sup>2</sup>
- reviewed the qualifications of the Grantee's 3 busdrivers;
- inspected 1 of the 2 schoolbuses that the Grantee used to transport Head Start children on field trips;

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<sup>1</sup> We did not review the McQueeney Head Start center.

<sup>2</sup> The 85 current employees and contractors were partially or fully funded by the Head Start grant award.

- reviewed the Grantee’s documentation of fire and sanitation inspections;
- visited 6 of the Grantee’s 7 childcare facilities; and
- discussed our preliminary findings with Grantee 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 December 2009:

- The files on the Grantee’s 85 employees and contractors contained evidence of the required background checks. However, the Grantee did not always request these checks when they were due.
- Four of the six Grantee childcare facilities that we visited did not meet all Federal Head Start and State requirements on protecting children from unsafe materials and equipment.
- Two of the six Grantee childcare facilities that we visited did not provide a fully secure environment for the children in their 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 follow these requirements jeopardized the health and safety of children in its care.

### **EMPLOYEE BACKGROUND CHECKS**

#### **Federal and State Requirements**

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.

The Texas Administrative Code, chapter 745, rules 601 through 753, outlines the requirements for background checks on employees and contractors at childcare centers. Rule 745.615 requires that background checks be performed as part of an applicant’s initial employment process.

Three types of background checks required by this rule include (1) a name-based check of the State’s database of crimes committed in the State, (2) a check of the State’s central registry for instances of child abuse or neglect, and (3) a fingerprint-based check of the Federal Bureau of Investigation (FBI) database of crimes committed in the United States.

Rule 745.615 requires that background checks be performed on all persons aged 14 or older, other than clients of the operation, who will regularly or frequently be present at the operation while children are in care. The name-based check and the child abuse or neglect registry check must be repeated every 24 months. According to the Texas Department of Family and Protective Services’ *Implementation Progress Report*,<sup>3</sup> the State phased in a rollout schedule to address the one-time fingerprint-based check requirement.<sup>4</sup> The State’s rollout schedule began requiring the fingerprint-based check for certain new employees on September 1, 2007, and required this check to be completed no later than September 1, 2009, for all employees and persons who regularly or frequently stayed or worked at the facility.

### **Grantee’s Compliance With Background Check Requirements**

As of December 2009, the Grantee had obtained all 3 types of background checks for its 85 employees and contractors. However, the Grantee did not always request these checks when they were due. As shown in the table below, the Grantee did not request initial background checks on 24 employees (teachers, teacher aides, and cooks) for as long as 7 years after they were hired.

#### **Length of Time Employees Worked Without Initial Background Checks**

<b>Time Employed Without an Initial Background Check</b>	<b>Number of Employees</b>
30 days or less	2
31 to 364 days	6
1 to 7 years	16
<b>Total</b>	<b>24</b>

Of the 16 employees whose background checks were 1 to 7 years late, 5 did not have their initial background checks completed until more than 6 years after they were hired.

In addition, the Grantee did not request 24-month and/or fingerprint-based checks on 45 employees in a timely manner. These lapses ranged from 1 day to 1 year and 8 months.

By not ensuring that all employees had timely background checks, the Grantee potentially jeopardized the safety of children in its care.

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<sup>3</sup> *SB 758 Implementation Progress Report: A Report From the Texas Department of Family and Protective Services*, issued September 1, 2009.

<sup>4</sup> The Texas Administrative Code, rule 745.630, does not require this check to be repeated if a person has a fingerprint-based criminal history on record with the Texas Department of Family and Protective Services and it has not been more than 24 months since a name-based criminal history check was resubmitted.

## **MATERIAL AND EQUIPMENT SAFETY AND FACILITY SECURITY**

### **Federal and State Requirements**

Pursuant to Federal Head Start regulations (45 CFR § 1304.53(a)), grantees must provide for the maintenance, repair, safety, and security of all Head Start facilities, materials, and equipment. Grantees must ensure that indoor and outdoor premises are cleaned daily and kept free from undesirable and hazardous materials and conditions.

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 requirements 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.

Texas Administrative Code rule 746.4603(5) states that children must not use multiple-occupancy swings such as teeter-totters. Further, rule 746.3701(1) requires that electrical outlets accessible to children younger than 5 years of age have childproof covers or safety outlets. The Texas Department of Family and Protective Services Minimum Standards for Licensed Child-Care Centers state:

Supervision alone cannot prevent all accidents and injuries, therefore the environment must be free of health and safety hazards to reduce risks to children. Additional examples of hazards to children include: sharp scissors, plastic bags, knives, cigarettes, matches, lighters, flammable liquids, drugs/medications, sharp instruments such as an ice pick, power tools, cleaning supplies, chemicals and other items labeled keep out of the reach of children.<sup>5</sup>

### **Grantee's Compliance With Federal and State Requirements**

Our visits to six of the Grantee's facilities found that four facilities did not meet all Federal Head Start and State health and safety requirements on protecting children from unsafe materials and equipment. In addition, two of the four facilities did not provide a fully secure environment for the children in their care. We defined "facility security" as limiting public access to the facilities and preventing children from leaving the facilities.

*Comal No. 1 (visited December 16, 2009)*

- A pair of sharp scissors was in an open plastic bin on a bookshelf accessible to children (Appendix A, Photograph 1).
- Electrical outlets in classrooms and other areas accessible to children lacked child-resistant covers, and one outlet had exposed wires (Appendix A, Photographs 2a and 2b).

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<sup>5</sup> Section 42.042 of the Texas Human Resources Code requires the Texas Department of Family and Protective Services to establish minimum standards for childcare centers.

- Open buckets of bleach and soap solutions were placed on food carts before meals were served (Appendix A, Photograph 3).
- Lockers that children used to store backpacks and coats were not always attached to the wall and could have fallen.
- The exterior side doors to the building were unlocked and propped open. The doors opened to the street, allowing unrestricted entry into the facility (Appendix A, Photograph 4).
- A door of a portable classroom building was difficult to open, which could have prevented easy exit during a fire or other emergency. The bottom of the door scraped against the outside deck, which may have been warped (Appendix A, Photograph 5).

*Comal No. 2 (visited December 16, 2009)*

- The playground equipment included a teeter-totter (Appendix A, Photograph 6).
- An exposed tree stump and plastic landscape edging in an area leading to the playground presented potential tripping hazards (Appendix A, Photograph 7).
- Lockers that children used to store backpacks and coats were not always attached to the wall and could have fallen.

*Comal No. 4 (visited December 16, 2009)*

- Electrical outlets lacked child-resistant covers, and one outlet had exposed wires.
- Lockers that children used to store backpacks and coats were not always attached to the wall and could have fallen (Appendix A, Photograph 8). We witnessed one set of lockers pulling away from the wall as a child pulled her coat from a hook at the top of a locker.

*Seguin (visited December 16, 2009)*

- A vent cover with sharp edges at the bottom of an exterior wall was partly detached and accessible to children (Appendix A, Photograph 9).
- The exterior side door to the building was unlocked, allowing unrestricted entry into the facility. The door opened to a hallway where classrooms were located. We observed people entering the facility in the middle of the day without having to identify themselves (Appendix A, Photograph 10).

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.

## **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 follow procedures to ensure that:

- required background checks are completed when due,
- all unsafe conditions are corrected and all necessary repairs are addressed in a timely manner, and
- all facilities are secure.

## **GRANTEE COMMENTS AND OFFICE OF INSPECTOR GENERAL RESPONSE**

In written comments on our draft report, the Grantee described actions that it had taken or planned to take to address the deficiencies that we identified. Specifically, the Grantee stated that initial background checks and FBI fingerprinting would be conducted before hiring new employees and that background checks would be repeated every 24 months from the hire date. Furthermore, the Grantee said that it had implemented action plans to correct some of the reported material and equipment deficiencies and that it intended to implement plans to correct the remaining deficiencies by September 7, 2010.

The Grantee disagreed with our finding that an open bucket of bleach solution was stored on a food cart before meals were served at Comal No. 1. The Grantee said that bleach was kept in spray bottles and was not present on the food cart at the time of our review. The Grantee's comments are included in their entirety as Appendix B.

Kitchen staff at Comal No. 1 told us that one of the buckets shown in Appendix A, Photograph 3, contained a bleach/water solution that was used to wipe tables after meals.



# **APPENDIXES**

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



**Photograph 1 – Taken at Comal No. 1 on 12/16/09 showing a pair of sharp scissors and safe scissors stored in an open plastic bin on a bookshelf accessible to children.**



**Photograph 2a – Taken at Comal No. 1 on 12/16/09 showing an outlet in a main hallway that lacked a wallplate. The wires in the wall were accessible.**



**Photograph 2b – Taken at Comal No. 1 on 12/16/09 showing a closeup of the exposed outlet in Photograph 2a.**



**Photograph 3 – Taken at Comal No. 1 on 12/16/09 showing open buckets of bleach/water and soap/water solutions stored on food carts in the classroom hallway before meals were served.**



**Photograph 4 – Taken at Comal No. 1 on 12/16/09 showing a side entrance with one of the double doors propped open. The doors, which opened to the street, allowed unrestricted access to the classrooms.**



**Photograph 5 – Taken at Comal No. 1 on 12/16/09 showing a portable classroom building door that was difficult to open. Opening the door beyond this point required significant effort because the door scraped the deck.**



**Photograph 6 – Taken at Comal No. 2 on 12/16/09 showing a teeter-totter on the playground.**



**Photograph 7 – Taken at Comal No. 2 on 12/16/09 showing an exposed tree stump and surrounding plastic landscape edging in an area leading to the playground. The stump and edging were potential tripping hazards.**



**Photograph 8 – Taken at Comal No. 4 on 12/16/09 showing lockers that were not attached to the wall. We witnessed one set of lockers pulling away from the wall as a child pulled her coat from a hook at the top of a locker.**



**Photograph 9 – Taken at Seguin on 12/16/09 showing a partly detached vent cover with sharp edges at the bottom of an exterior wall.**



**Photograph 10 – Taken at Seguin on 12/16/09 showing an unlocked side door that allowed unrestricted access to the building. The door opened to a hallway where classrooms were located.**



APPENDIX B: GRANTEE COMMENTS



**COMMUNITY COUNCIL of SOUTH CENTRAL TEXAS**

August 11, 2010

Ms. Patricia Wheeler,  
Regional Inspector General for Audit Services  
Office of Audit Services, Region VI  
1100 Commerce Street, Room 632  
Dallas, Texas 75242

Re: Report Number: A-06-09-00081

Dear Ms. Wheeler:

Community Council of South Central Texas, Inc. (CCSCT) received the above referenced correspondence dated August 9, 2010 on August 11, 2010. Enclosed please find one (1) original copy of CCSCT's Office of Inspector General Review Action Plan. This Action Plan provides written comments on all statement of concurrences specified in the report.

In compliance with the request required by the OIG, an electronic copy has been generated and sent to your office.

Should you have questions or need additional information, please feel free to call or email me at (830) 303 4376, ext. 235 or [rlucio@ccsct.org](mailto:rlucio@ccsct.org). Thank you in advance for your assistance.

Very Respectfully,

*Robert J. Lucio*

Robert J. Lucio  
Executive Director  
Community Council of South Central Texas, Inc.

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**COMMUNITY COUNCIL OF SOUTH CENTRAL TEXAS, INC  
OFFICE OF INSPECTOR GENERAL REVIEW  
ACTION PLAN**

1

FINDING	DESCRIPTION	PROGRAM PLAN	RESPONSIBLE PARTY	TIMELINE	DOCUMENTATION
<p>The files on the Grantee's 85 employees and contractors contained evidence of the required background checks. However, the Grantee did not always request these checks when they were due.</p>	<p>The Grantee did not request background checks when they were due. The Grantee did not request initial background checks on 24 employees for as long as 7 years after they were hired.</p> <p>Of the 16 whose background checks were 1 to 7 years late, 5 did not have their initial background checks completed until more than 6 years after they were hired.</p> <p>In addition, the Grantee did not request 24-month and/or fingerprint-based checks on 45 employees in a timely manner. These lapses ranged from 1 day to 1 year and 8 months.</p>	<p>Criminal background checks will be conducted prior to an employee being hired and every 24 months from the hire date.</p> <p>Initial background checks and FBI Fingerprinting will be conducted prior to any employee being hired.</p> <p>24-month criminal background checks will be completed in accordance with initial hire date. FBI Fingerprinting will be conducted prior to an employee being hired.</p>	<p>Head Start Secretary  CCSCT Human Resource Director  Head Start Program Director</p>	<p>Effective January 1, 2010  Ongoing</p>	<p>Texas Department of Family and Protective Services Background Check Clearance Report</p> <p>FAST Pass receipts</p> <p>Personnel Action Form</p>

COMMUNITY COUNCIL OF SOUTH CENTRAL TEXAS, INC  
OFFICE OF INSPECTOR GENERAL REVIEW  
ACTION PLAN

2

FINDING	DESCRIPTION	PROGRAM PLAN	RESPONSIBLE PARTY	TIMELINE	DOCUMENTATION
Four of the six Grantee childcare facilities that were visited did not meet all Federal Head Start and State requirements on protecting children from unsafe materials and equipment.	<b>Comal No. 1</b> A pair of sharp scissors was in an open plastic bin on a bookshelf accessible to children.	Center Directors will conduct monthly Classroom and Building Safety Reviews to ensure facilities are free of unsafe materials and equipment.	Teachers Center Directors	Effective September 2010	Classroom and Building Safety Checklists Maintenance Logs CACFP Observation Reviews
	Electrical outlets in classrooms and other areas accessible to children lacked child resistant covers, and one outlet had exposed wires.	Center Directors will conduct walk-thru of classrooms and other areas prior to the start of the school year to ensure safety.	Center Directors	September 7, 2010	TDFPS Child Care Licensing Reports
	Open buckets of bleach and soap were placed on food carts before meals were served.	Soapy water and plain water are used by the children to clean the dining tables. Soapy water will not be stored on food carts. Bleach is only utilized by teaching staff and kitchen staff via spray bottle and was not present on cart at time of review.	Nutrition Specialist Center Directors Food Service Staff	Effective January 1, 2010 Ongoing	Monthly Food Service Observation Reviews
	Lockers that children used to store backpacks and coats were not always attached to the wall and could have fallen.	Lockers and other unstable furniture will be mounted to wall or floor to ensure safety prior to the start of the school year.	Center Directors	September 7, 2010	Classroom and Building Safety Checklist Maintenance Request Form

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	<p><b><i>Comal No. 2</i></b></p> <p>The playground equipment included a teeter-totter.</p> <p>An exposed tree stump and plastic landscape edging in an area leading to the playground presented potential tripping hazards.</p> <p>Lockers that children used to store backpacks and coats were not always attached to the wall and could have fallen.</p>	<p>The teeter-totter was removed.</p> <p>The exposed tree stump and plastic landscape edging was removed.</p> <p>Lockers were secured to walls.</p>	<p>Center Director</p> <p>Center Director</p> <p>Center Director</p>	<p>2/16/2010</p> <p>2/16/2010</p> <p>2/25/2010</p>	<p>Classroom and Building Safety Checklists</p> <p>Grounds Maintenance and Safety Checklist</p> <p>Maintenance Logs</p>
	<p><b><i>Comal No. 4</i></b></p> <p>Electrical outlets lacked child-resistant covers, and one outlet had exposed wires.</p> <p>Lockers that children used to store backpacks and coats were not always attached to the wall and could have fallen.</p>	<p>Center Directors will conduct monthly Classroom and Building Safety Reviews to ensure facilities are free of unsafe materials and equipment.</p> <p>Lockers will be secured to walls prior to the start of the school year.</p>	<p>Center Director</p> <p>Center Director</p>	<p>Effective September 7, 2010</p> <p>September 7, 2010</p>	<p>Classroom and Building Safety Checklists</p>

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	<p><i>Seguin Center</i></p> <p>A vent cover with sharp edges at the bottom of an exterior wall was partly detached and accessible to children.</p>	<p>The vent cover will be replaced.</p> <p>Center Directors will conduct grounds maintenance check prior to the start of the school year.</p>	<p>Center Director</p>	<p>September 7, 2010</p>	<p>Grounds Maintenance and Safety Checklist</p>

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FINDING	DESCRIPTION	PROGRAM PLAN	RESPONSIBLE PARTY	TIMELINE	DOCUMENTATION
Two of the six Grantee childcare facilities that were visited did not provide a fully secure environment for the children in their care.	<b>Comal No. 1</b>				
	The exterior side doors to the buildings were unlocked and propped open. The doors opened to the street, allowing unrestricted entry into the facility.	Center Directors will ensure doors to building are secured at all times. Center Directors will designate authorized entryways.	Center Directors	Effective January 4, 2010  Ongoing	Grounds Maintenance and Safety Checklist
	A door of a portable classroom building was difficult to open, which could have prevented easy exit during a fire or other emergency. The bottom of the door scraped against the outside deck, which may have been warped.	The ramp of the portable classroom building will be repaired with flex wood to prevent ongoing warping and ensure easy entry/exit.	Head Start Program Director	September 7, 2010	Invoices
	<b>Seguin Center</b>				
	The exterior side door to the building was unlocked, allowing unrestricted entry into the facility. The door opened to a hallway where classrooms were located.	The Center Director will ensure door to building is secured at all times. Center Director will designate authorized entryway at the site.	Center Director	Effective January 4, 2010	Grounds Maintenance and Safety Checklist

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FINDING	DESCRIPTION	PROGRAM PLAN	RESPONSIBLE PARTY	TIMELINE	DOCUMENTATION
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 follow these requirements jeopardized the health and safety of children in its care.	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.	Monitoring plans have been developed to ensure compliance with Federal and State health safety requirements.	Head Start Program Director  All Component Specialists  All Center Directors	September 7, 2010	Component monitoring plans  Monitoring plan checklists