



Washington, D.C. 20201

September 22, 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 Head Start Health and Safety Standards at Rolling Plains Management Corporation (A-06-10-00053)

Attached, for your information, is an advance copy of our final report on Rolling Plains Management Corporation's (the Grantee) compliance with Head Start health and safety standards. 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 Patricia Wheeler, Regional Inspector General for Audit Services, Region VI, at (214) 767-8414 or through email at Trish.Wheeler@oig.hhs.gov. Please refer to report number A-06-10-00053.

Attachment



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of Inspector General

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

September 24, 2010

Report Number: A-06-10-00053

Mr. Felix Taylor
Executive Director
Rolling Plains Management Corporation
P.O. Box 490
Crowell, TX 79227-0490

Dear Mr. Taylor:

Enclosed is the U.S. Department of Health & Human Services (HHS), Office of Inspector General (OIG), final report entitled *Review of Head Start Health and Safety Standards at Rolling Plains Management Corporation*. 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. Please refer to report number A-06-10-00053 in all correspondence.

Sincerely,

/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 HEAD START
HEALTH AND SAFETY
STANDARDS AT
ROLLING PLAINS
MANAGEMENT CORPORATION**



Daniel R. Levinson
Inspector General

September 2010
A-06-10-00053

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:

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Notices

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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.

Rolling Plains Management Corporation (the Grantee) is a nonprofit organization with headquarters in Crowell, Texas. The Grantee provides comprehensive child development programs through community-based centers. The Grantee operates a Head Start program at 11 State-licensed facilities in 8 counties. For program year December 1, 2009, through November 30, 2010, OHS awarded \$1.8 million in Federal Head Start funds to the Grantee to provide services to 294 children. On June 30, 2009, the Grantee also received \$143,375 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 January 2010:

- The files on 6 of the Grantee’s 75 employees and contractors did not contain evidence of all required background checks. The files on the 69 remaining employees and contractors contained evidence of the required background checks, but the checks were not always requested when they were due.
- The Grantee’s 11 childcare facilities did not meet all Federal Head Start and State requirements on protecting children from unsafe materials and equipment.
- Three of the Grantee’s childcare facilities 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

In written comments on our draft report, the Grantee agreed with most of our findings and described actions that it had taken or planned to take to address most of the deficiencies that we identified. The Grantee did not address four of our findings and disagreed with two other findings regarding the lack of documentation of carbon monoxide detector tests and severe weather drills at Archer City and Turner, respectively. The Grantee stated that it had documentation of the tests and drills. Regarding our finding at one facility that a side door opening to an entryway that led to two classrooms was unlocked, the Grantee said that each classroom must have two exits.

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

OFFICE OF INSPECTOR GENERAL RESPONSE

At the time of our visits to Archer City and Turner, the Grantee was unable to provide us with documentation of carbon monoxide detector tests and severe weather drills, respectively, and the Grantee did not provide the documentation with its comments. We consider the unlocked door to be a security risk because it would allow unrestricted entry to the facility. Nothing in the Grantee's comments caused us to revise our findings or recommendations.

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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.

Rolling Plains Management Corporation

Rolling Plains Management Corporation (the Grantee) is a nonprofit organization with headquarters in Crowell, Texas. The Grantee provides comprehensive child development programs through community-based centers. The Grantee operates a Head Start program at 11 State-licensed facilities in 8 counties. For program year December 1, 2009, through November 30, 2010, OHS awarded approximately \$1.8 million in Federal Head Start funds to the Grantee to provide services to 294 children. On June 30, 2009, the Grantee also received \$143,375 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 January 2010. 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 January 11 through 14, 2010, at the Grantee's administrative office in Crowell, Texas, and at its 11 childcare facilities in the Texas towns of Archer City, Chillicothe, Crowell, Graham, Knox City, Munday, Olney, Paducah, Quannah, Seymour, and Vernon.

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 current Head Start grant award documents;
- reviewed the Grantee's files on all 63 Head Start employees and 12 individuals under contract with the Grantee (contractors);¹
- reviewed the qualifications of the Grantee's 9 contracted busdrivers;
- inspected the 5 schoolbuses that the Grantee used to transport Head Start children;

¹ The Grantee had 63 Head Start employees and 3 contractors who were paid with Head Start funds. Nine contracted busdrivers were not paid with Head Start funds but required background checks under Texas Administrative Code rule 745.615(a)(8) because they were frequently at the Grantee's facilities while children were present.

- reviewed the Grantee’s documentation of fire and sanitation inspections;
- visited the Grantee’s 11 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 January 2010:

- The files on 6 of the Grantee’s 75 employees and contractors did not contain evidence of all required background checks. The files on the 69 remaining employees and contractors contained evidence of the required background checks, but the checks were not always requested when they were due.
- The Grantee’s 11 childcare facilities did not meet all Federal Head Start and State requirements on protecting children from unsafe materials and equipment.
- Three of the Grantee’s childcare facilities 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 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*,² the State phased in a rollout schedule to address the one-time fingerprint-based check requirement.³ 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 January 2010, the files on 6 of the Grantee's 75 employees and contractors did not contain evidence of all required background checks. Specifically:

- The Grantee did not request a name-based check, child abuse or neglect registry check, or fingerprint-based check for a payroll clerk hired in March 2005 and an information technology specialist hired in May 2009 and did not request a fingerprint-based check for a substitute teacher hired in August 2006.
- The Grantee did not request a name-based check, child abuse or neglect registry check, or fingerprint-based check for three contractors (a child therapist, a licensed counselor, and a dietitian) who made regular visits to its childcare facilities.

Although the Grantee had obtained all 3 types of background checks on the 69 remaining employees and contractors, the Grantee did not always request these checks when they were due. As shown in the table on the next page, the Grantee did not request initial background checks on 23 employees (teachers, teacher aides, center directors, and cooks) for as long as 2 years after they were hired.

² *SB 758 Implementation Progress Report: A Report From the Texas Department of Family and Protective Services*, issued September 1, 2009.

³ 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.

Length of Time Employees Worked Without Initial Background Checks

Time Employed Without an Initial Background Check	Number of Employees
30 days or less	4
31 to 364 days	15
1 to 2 years	4
Total	23

The Grantee also did not request initial background checks on another six employees (administrative staff who did not have regular contact with children) for up to 6 years after they were hired.

In addition, the Grantee did not request the 24-month and/or fingerprint-based checks on 26 employees and contractors in a timely manner. These lapses ranged from 1 day to 1 year and 8 months.

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

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.

The Texas Administrative Code, chapter 746, rule 3407, requires childcare centers to repair and maintain buildings, grounds, and equipment and to keep all cleaning supplies and other toxic materials out of the reach of children. Rules 746.4305 and 746.4307 require childcare centers to ensure that play areas have a fence that is at least 4 feet high and have at least two exits. Rule 746.4601(9) states that platforms more than 20 inches high on which prekindergarten and younger children play must be equipped with protective barriers sufficient to prevent children from crawling over or falling through the barriers. Further, rule 746.4603(5) states that children must not use multiple-occupancy swings such as teeter-totters. Rule 746.4001 requires that first aid kits be available in each building, and rule 746.4003 lists the required contents and mandates that first aid supplies must not have expired.

Rule 746.3701(1) requires that electrical outlets accessible to children younger than 5 years of age have childproof covers or safety outlets. Rule 746.5307 requires each childcare center to inspect fire extinguishers monthly. Further, rules 746.5319 and 746.5537 require each childcare center to test all smoke detectors and carbon monoxide detectors monthly. Rule 746.5205 requires childcare centers to perform fire drills monthly and severe weather drills at least once every 6 months.

Grantee's Compliance With Material and Equipment Safety Requirements

Our visits to the Grantee's facilities found that none of the 11 facilities met all Federal Head Start and State health and safety requirements on protecting children from unsafe materials and equipment. In addition, 3 of the 11 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.

Archer City (visited January 13, 2010)

- A strip of sheet metal on a playground storage shed had sharp, jagged edges (Appendix A, Photograph 1).
- A first aid kit lacked tweezers and contained a bottle of peroxide that expired in October 2008.
- The playground equipment included a teeter-totter.
- The facility did not have documentation of monthly inspections of carbon monoxide detectors.

Chillicothe (visited January 13, 2010)

- An unlocked storage room located next to the classroom was accessible to children. The storage room contained stacks of opened cardboard boxes and chairs and had a darkened stairway that led to an unused room (Appendix A, Photograph 2).
- A strip of sheet metal on a playground storage shed had sharp, jagged edges.
- The playground gate did not close securely. The gate opened to the facility's parking lot (Appendix A, Photograph 3).
- The fence surrounding the playground, as measured from inside the playground, was less than 4 feet high.
- A first aid kit lacked cotton balls.
- The facility did not have documentation that it had performed severe weather drills.

Foard County (visited January 11, 2010)

- A board with a protruding nail was accessible to children on the playground (Appendix A, Photograph 4).
- An unlocked storage shed on the playground contained chairs, boxes, toys, and other items that posed a toppling hazard (Appendix A, Photograph 5).

Graham (visited January 11, 2010)

- A first aid kit lacked cotton balls, scissors, tweezers, and a first aid and emergency care guide.
- The edges of a rug were curled up, creating a tripping hazard (Appendix A, Photograph 6).

Knox City (visited January 12, 2010)

- A first aid kit lacked tweezers and a first aid and emergency care guide.
- The edges of a rug were curled up, creating a tripping hazard.

Munday (visited January 12, 2010)

- Disinfectant was stored in an unlocked cabinet accessible to children (Appendix A, Photograph 7).
- A first aid kit lacked cotton balls and a first aid and emergency care guide.

Olney (visited January 11, 2010)

- A platform that was more than 20 inches high lacked protective barriers sufficient to prevent children from crawling over or falling through the barriers (Appendix A, Photograph 8).
- A first aid kit lacked adhesive tape and multiple bandage sizes.
- The edges of a rug were curled up, creating a tripping hazard.
- The playground gate did not close securely. The facility was located on a major road.
- The facility was more than 4 months overdue for its next monthly inspection of fire extinguishers and smoke alarms. The last documented inspection was on August 6, 2009.
- The facility was more than 4 months overdue for its next monthly fire drill. The last documented fire drill was on August 6, 2009.

- The facility was more than 2 months overdue for its next biannual severe weather drill. The last documented severe weather drill was on April 22, 2009.

Dunbar (visited January 12, 2010)

- A board with a protruding nail was accessible to children on the playground.
- The chain-link fence around the playground had barbed wire tangled between its links and sharp, twisted ends exposed at the top (Appendix A, Photograph 9).
- A strip of sheet metal on a playground shed had sharp, jagged edges.
- Steps to the main entrance had loose boards, which created a tripping hazard (Appendix A, Photograph 10).
- The facility did not have documentation that it had performed severe weather drills.

Turner (visited January 12, 2010)

- Paint and cleaning solution stored under sinks were accessible to children (Appendix A, Photographs 11 and 12).
- An unlocked gate on the playground allowed children access to a radio tower and two air conditioning units. The tower rose well above the childcare facility's roof and was built in a manner that allowed easy climbing (Appendix A, Photograph 13).
- A first aid kit lacked adhesive tape, multiple bandage sizes, a thermometer, and tweezers.
- A side door was unlocked. The door opened to a small entryway that led directly to two classrooms.
- The facility did not have documentation that it had performed monthly fire drills.
- The facility did not have documentation that it had performed monthly inspections of smoke detectors.
- The facility did not have documentation that it had performed severe weather drills.
- An electrical outlet accessible to children in a classroom lacked child-protective caps.

Seymour (visited January 13, 2010)

- The sharp ends of staples protruded from a bookcase within reach of children in a classroom (Appendix A, Photograph 14).

- The edges of a rug were curled up, creating a tripping hazard.

Wilbarger County (visited January 13, 2010)

- A cordless phone with an exposed battery was lying on a children's play table. The battery had a label warning that "toxic materials could be released" (Appendix A, Photograph 15).
- Toilet brushes stored under a bathroom sink were accessible to children (Appendix A, Photograph 16).
- Cleaning solution stored on an open shelf in a room adjacent to a classroom was accessible to children.
- A first aid kit lacked multiple bandage sizes.
- A strip of sheet metal on a playground shed had sharp, jagged edges.
- The playground had only one exit available because one of its gates was chained and locked. The teachers did not have the keys to the lock when the children were on the playground.
- An unlocked gate on the playground allowed access to air conditioning condensing units.

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

In written comments on our draft report, the Grantee agreed with most of our findings and described actions that it had taken or planned to take to address most of the deficiencies that we identified. In addition to addressing material and equipment safety and facility security deficiencies, the Grantee stated that it had completed background checks on the payroll clerk, the technology specialist, and the three contractors who were identified in our report. Furthermore, the Grantee said that it had implemented plans to track each employee's 24-month background check. The Grantee did not address our finding that its files contained no evidence of a fingerprint-based background check for a substitute teacher hired in August 2006. The Grantee also did not address the two material and equipment safety findings at Knox City or the finding at Olney that curled rug edges created a tripping hazard.

The Grantee disagreed with our findings at Archer City and Turner regarding the lack of documentation of carbon monoxide detector tests and severe weather drills, respectively. The Grantee said that it had located such documentation. Regarding our finding at Turner that a side door opening to an entryway that led to two classrooms was unlocked, the Grantee said that each classroom must have two exits.

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

OFFICE OF INSPECTOR GENERAL RESPONSE

At the time of our visits to Archer City and Turner, the Grantee was unable to provide us with documentation of carbon monoxide detector tests and severe weather drills, respectively, and the Grantee did not provide the documentation with its comments. Regarding our finding about the unlocked side door at Turner, we consider the unlocked door to be a security risk because it would allow unrestricted entry to the facility. Nothing in the Grantee's comments caused us to revise our findings or recommendations.

APPENDIXES

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



Photograph 1 – Taken at Archer City on 1/13/10 showing a playground storage shed with a strip of sheet metal having sharp, jagged edges.



Photograph 2 – Taken at Chillicothe on 1/13/10 showing the contents of an unlocked storage room located next to the classroom. The storage room was accessible to children.



Photograph 3 – Taken at Chillicothe on 1/13/10 showing a playground gate that could not be secured because of a gap between the latch and the post. The gate opened to the facility’s parking lot.



Photograph 4 – Taken at Foard County on 1/11/10 showing a nail protruding from a board on the playground.



Photograph 5 – Taken at Foard County on 1/11/10 showing chairs, boxes, toys, and other items stacked in an unlocked storage shed on the playground.



Photograph 6 – Taken at Graham on 1/11/10 showing a rug with curled edges, creating a tripping hazard.



Photograph 7 – Taken at Munday on 1/12/10 showing disinfectant stored in an unlocked cabinet accessible to children.



Photograph 8 – Taken at Olney on 1/11/10 showing a platform more than 20 inches high without sufficient protective barriers.



Photograph 9 – Taken at Dunbar on 1/12/10 showing barbed wire running through the playground fence and sharp, twisted chain-link ends at the top.



Photograph 10 – Taken at Dunbar on 1/12/10 showing loose boards on steps to the facility's main entrance.



Photograph 11 – Taken at Turner on 1/12/10 showing paint with a label warning “KEEP OUT OF REACH OF CHILDREN” stored in an unlocked cabinet under the children’s bathroom sink.



Photograph 12 – Taken at Turner on 1/12/10 showing cleaning solution with a label warning “KEEP OUT OF REACH OF CHILDREN” stored in an unlocked cabinet under a classroom sink.



Photograph 13 – Taken at Turner on 1/12/10 showing an unlocked playground gate leading to a radio tower and two air conditioning units.



Photograph 14 – Taken at Seymour on 1/13/10 showing the sharp ends of staples protruding from a bookcase in a classroom.



Photograph 15 – Taken at Wilbarger County on 1/13/10 showing a cordless phone with an exposed battery lying on a children’s play table. The battery had a label warning that “toxic materials could be released.”



Photograph 16 – Taken at Wilbarger County on 1/13/10 showing toilet brushes stored under a bathroom sink that was accessible to children.

APPENDIX B: GRANTEE COMMENTS

ROLLING PLAINS MANAGEMENT CORPORATION HEAD START

P.O. BOX 490 PHONE (940) 684-1571

CROWELL, TEXAS 79227



August 16, 2010

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

Re: Report number A-06-10-00053

Dear Ms. Wheeler:

This letter is in response to your draft report dated August 9, 2010.

Grantee's Compliance With Background Check Requirements:

- Payroll Clerk hired in March, 2005 – A complete background check was completed on this employee in January of 2010.
- Technology Specialist - A complete background check was completed on this employee in January of 2010.
- Three contractors, child therapist, licensed counselor, and dietician - Complete background checks were completed on these contractors in August of 2010.

Employees are hired with the understanding that a complete background check will be conducted. Any violations prohibiting their presence while children are in care will result in immediate termination. Ticker files have been developed to assist in tracking each employee's 24 month background check.

Material and Equipment Safety and Facility Security:

Archer City

- A strip of sheet metal on a playground storage shed had sharp, jagged edges – This was repaired last March, 2010.

- A first aid kit lacked tweezers and contained a bottle of peroxide that expired in October 2008 – A new first aid kit with the required items was purchased in March, 2010.
- The playground equipment included a teeter-totter – This was removed in March, 2010.
- The facility did not have documentation of monthly inspections of carbon monoxide detectors – This was documented on the wrong form. It was documented on the correct form in January 13, 2010.

Chillicothe

- An unlocked storage room located next to the classroom was accessible to children. The storage room contained stacks of opened cardboard boxes and chairs and had a darkened stairway that led to an unused room – A door that can be locked will be installed to cover this and will be completed by August 19, 2010.
- A strip of sheet metal on a playground storage shed had sharp, jagged edges – This will be repaired on August 19, 2010.
- The playground gate did not close securely. The gate opened to the facility's parking lot – This gate was repaired in April, 2010.
- The fence surrounding the playground, as measured from inside the playground was less than 4 feet high – The reason for this was soft-surfacing was added around the swings and the contractor put the plastic timbers against the fence. This will be corrected by August 22, 2010.
- The first aid kit lacked cotton balls – Cotton balls were purchased and put in first aid kit in March, 2010.
- The facility did not have documentation that it had performed severe weather drills – A severe weather drill was done in March, 2010.

Foard County

- A board with a protruding nail was accessible to children on the playground – This board was removed on January 15, 2010.
- An unlocked storage shed on the playground contained chairs, boxes, toys, and other items that posed a toppling hazard – A lock was purchased and put on this door on January 15, 2010.

Graham

- A first aid kit lacked cotton balls, scissors, tweezers, and a first aid and emergency care guide – A new first aid kit with the required items was purchased in March, 2010.
- The edges of a rug were curled up, creating a tripping hazard – These edges were secured to the floor with new tape on January 11, 2010.

Munday

- Disinfectant was stored in an unlocked cabinet accessible to children – This was removed and placed in a locked cabinet on January 12, 2010.
- A first aid kit lacked cotton balls and a first aid and emergency care guide - A new first aid kit with the required items was purchased in March, 2010.

Olney

- A platform that was more than 20 inches high lacked protective barriers sufficient to prevent children from crawling over or falling through the barriers – Rails will be installed at the appropriate distance apart on August 19, 2010.
- The first aid kit lacked adhesive tape and multiple bandage sizes – Adhesive tape and multiple bandage sizes were purchased on January 11, 2010 and placed in kit.
- The playground gate did not close securely. The facility was located on a major road – The gate was repaired on January 11, 2010.
- The facility was more than 4 months overdue for its next monthly inspection of fire extinguishers and smoke alarms. The last documented inspection was on August 6, 2009 – This was documented on the wrong form. It was documented on the correct form on January 11, 2010.
- The facility was more than 4 months overdue for its next monthly fire drill. The last documented fire drill was on August 6, 2009 – This was documented on the wrong form. It was documented on the correct form on January 11, 2010.
- The facility was more than 2 months overdue for its next biannual severe weather drill. The last documented severe weather drill was on April 22, 2009 – This was documented on the wrong form. It was documented on the correct form on January 11, 2010.

Dunbar

- A board with a protruding nail was accessible to children on the playground – This was removed on January 12, 2010.
- The chain-link fence around the playground had barbed wire tangled between its links and sharp, twisted ends exposed at the top – This was repaired on January 12, 2010.
- A strip of sheet metal on a playground shed had sharp, jagged edges – This was repaired on January 12, 2010.
- Steps to the main entrance had loose boards, which created a tripping hazard – This was repaired in March, 2010.
- The facility did not have documentation that it had performed severe weather drills – The facility performed a severe weather drill the first week of March, 2010.

Turner

- Paint and cleaning solution stored under sinks were accessible to children – This was removed on January 12, 2010.
- An unlocked gate on the playground allowed children access to a radio tower and two air conditioning units. The tower rose well above the childcare facility's roof and was built in a manner that allowed easy climbing – A lock was purchased the afternoon of January 12, 2010 and installed on the gate the same day.
- A first aid kit lacked adhesive tape, multiple bandage sizes, a thermometer, and tweezers – A new first aid kit was purchased on January 13, 2010.
- A side door was unlocked. The door opened to a small entryway that led directly to two classrooms – This is the second exit for these two classrooms. Classrooms must have two exits.
- The facility did not have documentation that it had performed monthly inspections of smoke detectors – The documentation had been moved by WIC personnel to a different place. It is now on the bulletin where it should be.
- The facility did not have documentation that it had severe weather drills – The documentation had been moved by WIC personnel to a different place. It is now on the bulletin where it should be as of January 12, 2010.
- An electrical outlet accessible to children in a classroom lacked child-protective caps – This was done on January 12, 2010.

Seymour

- The sharp ends of staples protruded from a bookcase within reach of children in a classroom – This was repaired on January 13, 2010.
- The edges of a rug were curled up, creating a tripping hazard - These edges were secured to the floor with new tape on January 13, 2010.

Wilbarger County

- A cordless phone with an exposed battery was lying on a children's play table. The battery had a label warning that "toxic materials could be released" – This was removed on January 13, 2010.
- Toilet brushes stored under a bathroom sink were accessible to children – These were removed on January 13, 2010.
- Cleaning solution stored on an open shelf in a room adjacent to a classroom was accessible to children – This was removed on January 12, 2010.
- A first aid kit lacked multiple bandage sizes – Multiple bandage sizes were purchased on January 13, 2010 and put in the kit.
- A strip of sheet metal on a playground shed had sharp, jagged edges – This was repaired on January 14, 2010.
- The playground had only one exit available because one of its gates was chained and locked. The teachers did not have the keys to the lock when the children were on the playground – This lock was replaced on January 14, 2010.

- An unlocked gate on the playground allowed access to air conditioning condensing units – A lock was purchased and installed on January 14, 2010.

Inadequate or Inconsistently Followed Procedures

We have procedures in place for all of these deficiencies. We will add columns to our tracking forms that center staff submits monthly to the central office for all of these deficiencies. We will re-train staff on these procedures and additions to forms on August 19, 2010.

If you need additional information, please feel free to call me at 800-633-0852 or 940-684-1571.

Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Mary Jo Tole".

Mary Jo Tole
Head Start Director