



**Snohomish County**

March 21, 2024

**County Council**  
**Heidi Beazizo, Chief of Staff**

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**To: Responsible HHS Official**

Mr. Khari M. Garvin  
Director, Office of Head Start  
330 C Street SW, Washington DC 20024

**Re: Office of Head Start Monitoring Report**

Dear Mr. Garvin:

I am writing on behalf of the Snohomish County Council to address an “area of non-compliance” resulting from the June 26-June 30, 2023 monitoring review of the Snohomish County Early Head Start Program, grant number 10CH011314. The goal of my letter is to support the appeal of ANC – 642(c)(1)(C)(iii): the grant recipient did not ensure that governing body members did not have a conflict of interest.

**The monitoring feedback reads:**

The grant recipient's Advisory Board included three members currently employed by the grant recipient, creating a potential conflict of interest. During discussions, the division manager of early learning confirmed that the three Board members were employed by the grant recipient but not paid from the Early Head Start grant. The three Board members were responsible for approving required applications, budgets, and reports presented by program leadership. Members of the management team also confirmed that one of the Board members was directly responsible for reviewing and approving Early Head Start financial transactions and reports as the designated fiscal officer for the grant award.

The grant recipient did not ensure that governing body members did not have a conflict of interest; therefore, it was not in compliance with the regulation.

**Response:**

I assert that the Advisory Committee is not the governing body and that the governing body, the Legislative Branch of Snohomish County, maintains control of all financial and legal decisions. In support of those assertions, I will be reviewing the following: Governing Structure of Snohomish County, Delegated Authority provided by the original agreement between Snohomish County and HHS, and Budget Consideration and Adoption.

**Governing Structure of Snohomish County:**

The Washington State Constitution, Amendment 21, allows counties to adopt “Home Rule” charters, under which counties could form their own form of government with requirements of operation above those previously required by the Washington State Constitution. Snohomish County, as approved by

the voters, became a charter county in 1980, establishing the separate branches of government, including the Legislative Branch.

[Article 2, Section 2.20](#) of the Snohomish County Charter grants the Legislative Branch (the County Council) the following related powers:

- *To levy taxes, appropriate revenue, and adopt budgets for the county;*
- *Except as otherwise provided for herein, to establish by ordinance executive departments and to establish their powers and responsibilities; and*
- *To approve contracts or establish by ordinance methods by which any type of contract shall be approved*

The Snohomish County Council established the Department of Human Services as a department under the Executive Branch of government, by Ordinance 82-111<sup>1</sup> on October 26, 1982; Snohomish County Code [2.400.030](#) grants the Department of Human Services authority to administer and coordinate county programs and projects in accordance with county, state, and federal laws and regulations. One such functional area of authority is found in 2.400.030(2)(j): Early Childhood Education and Assistance Programs.

#### Delegated Authority:

Upon receiving designation as a Head Start agency, the Head Start Act requires the agency to establish and maintain a formal structure for program governance including a Governing Body with legal and fiscal responsibility for the Head Start agency.

As allowed in 45 CFR §1301.2, the Snohomish County Council approved Motion 10-408 on September 1, 2010, establishing the North Snohomish County Early Head Start Advisory Committee. The Motion further adopted the Procedures for Program Governance:

- *Delegating the day-to-day operating responsibility to the North Snohomish County Early Head Start Program (NSC EHS) within the Department of Human Services;*
- *Establishing the NSC EHS advisory committee to oversee key responsibilities related to the program governance and program improvement;*
- *Clearly stating that the establishment of the advisory committee does not supplant the Snohomish County Council's legal and fiscal responsibility related to program governance as required by the Head Start Act 642(c)(1);*
- *Assigning the selection of all NSC EHS Advisory Committee Members to the Snohomish County Council; and*
- *Authorizing the NSC EHS to provide budget recommendations to the Snohomish County Council for approval.*

This governing structure was communicated to, and approved, by the Department of Health and Human Services. The County has also previously been monitored for program compliance and no questions, concerns or findings has ever been issued related to this governing structure.

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<sup>1</sup> [secUbHPEp42o3GtsnLVZ1Zof \(amazonaws.com\)](#)

Budget Consideration and Adoption:

Snohomish County Code Chapter [4.26](#) establishes the budget procedures for Snohomish County including the submission of a proposed budget by the executive to the Council for consideration. Any NSC EHS budget recommendations are included in the executive proposed budget for Council review and consideration.

Summary:

As stated above, the power to approve applications and budgets continues to reside solely with the Snohomish County Council, the governing body for the Head Start agency. All current NSC EHS Board Members, even though employed by the Head Start agency, do not hold approval authority over any Early Head Start related applications or budgets and therefore, do not have a conflict of interest.

I am happy to answer any subsequent questions you may have related to this issue.

Sincerely,



Heidi Beazizo  
Chief of Staff, Snohomish County Council

cc: Mary Jane Brell-Vujovic  
Lacey Harper