



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of Head Start | 4th Floor – Switzer Memorial Building, 330 C Street SW, Washington DC 20024 eclkc.ohs.acf.hhs.gov

Program Performance Summary Report

To: Authorizing Official/Board Chairperson

Mr. Dave Somers

Snohomish, County of

3000 Rockefeller Ave M/S 305

Everett, WA 98201

From: Responsible HHS Official

Date: 09/27/2024

Mr. Khari M. Garvin

Director, Office of Head Start

From August 26, 2024 to August 30, 2024, the Administration for Children and Families (ACF) conducted a monitoring review of Snohomish, County of to determine whether the previously identified findings had been corrected. The Office of Head Start (OHS) would like to thank your governing body, policy council, staff, and parents of your program for their cooperation and assistance during the review. This monitoring report has been issued to Mr. Dave Somers, Authorizing Official/Board Chair, as legal notice to your agency of the results of the program review.

Based on the information gathered during this review, we have closed the previously identified findings which are included in this report. For any previous findings that are not included in this report and remain open, the recipient will receive a future follow-up review to determine the compliance status of those findings.

Please contact your Regional Office for guidance should you have any questions or concerns.

DISTRIBUTION OF THE REPORT

Copies of this report will be distributed to the following recipients:

Mr. Robert Colombini, Regional Program Manager

Mrs. MaryJane Brell-Vujovic, Chief Executive Officer/Executive Director

Ms. Kristina Saunsaucie, Early Head Start Director

Glossary of Terms

Compliant	No findings. Meets requirements of Head Start Program Performance Standard.
Area of Concern	An area for which the agency needs to improve performance. These issues should be discussed with the recipient's Regional Office of Head Start for possible technical assistance.
Area of Noncompliance	An area for which the agency is out of compliance with Federal requirements (including but not limited to the Head Start Act or one or more of the regulations) in one or more area of performance. This status requires a written timeline of correction and possible technical assistance or guidance from the recipient's program specialist. If not corrected within the specified timeline, this status becomes a deficiency.
Deficiency	<p>As defined in the Head Start Act, the term "deficiency" means:</p> <p>(A) a systemic or substantial material failure of an agency in an area of performance that the Secretary determines involves:</p> <ul style="list-style-type: none"> (i) a threat to the health, safety, or civil rights of children or staff; (ii) a denial to parents of the exercise of their full roles and responsibilities related to program operations; (iii) a failure to comply with standards related to early childhood development and health services, family and community partnerships, or program design and management; (iv) the misuse of funds received under this subchapter; (v) loss of legal status (as determined by the Secretary) or financial viability, loss of permits, debarment from receiving Federal grants or contracts, or the improper use of Federal funds; or (vi) failure to meet any other Federal or State requirement that the agency has shown an unwillingness or inability to correct, after notice from the Secretary, within the period specified; <p>(B) systemic or material failure of the governing body of an agency to fully exercise its legal and fiduciary responsibilities; or</p> <p>(C) an unresolved area of noncompliance.</p>

Performance Summary

Service Area	Applicable Standards	Grant Number(s)	Primary Review Finding Status(s)	Timeframe for Correction	Follow-up Compliance Level
Program Management and Quality Improvement	1302.102(c)(2)(i)	10CH011314	ANC	N/A	Corrected
Monitoring ERSEA: Eligibility, Recruitment, Selection, Enrollment, and Attendance	1302.12(a)(ii)	10CH011314	ANC	N/A	Corrected
Monitoring ERSEA: Eligibility, Recruitment, Selection, Enrollment, and Attendance	1302.12(l)-(m)	10CH011314	ANC	N/A	Corrected
Monitoring and Implementing Quality Education and Child Development Services	1302.92(c)(1)	10CH011314	ANC	N/A	Corrected
Program Management and Quality Improvement	642(c)(1)(C)(iii)	10CH011314	ANC	N/A	Corrected
Monitoring and Implementing Fiscal Infrastructure	642(d)(2)(A)-(I)	10CH011314	ANC	N/A	Corrected
Monitoring and Implementing Fiscal Infrastructure	642(d)(3)	10CH011314	ANC	N/A	Corrected



Program Management and Quality Improvement

Program Management

The grant recipient does not establish a management structure consisting of staff, consultants, or contractors who ensure high-quality service delivery; have sufficient knowledge, training, experience, and competencies to fulfill the roles and responsibilities of their positions; and provide regular supervision and support to staff.

FA-2 06/30/2023 ANC 642(c)(1)(C)(iii) Timeframe for Correction: 120 days

642(c) Program Governance- Upon receiving designation as a Head Start agency, the agency shall establish and maintain a formal structure for program governance, for the oversight of quality services for Head Start children and families and for making decisions related to program design and implementation. Such structure shall include the following: (1) GOVERNING BODY-(C) CONFLICT OF INTEREST- Members of the governing body shall--(iii) not be employed, nor shall members of their immediate family be employed, by the Head Start agency (including any delegate agency).

The grant recipient did not ensure that governing body members did not have a conflict of interest.

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.

Follow-up

Corrected

Timeframe for Correction: N/A

The grant recipient ensured governing body members did not have a conflict of interest. The grant recipient updated policies and procedures and reviewed the changes with relevant parties.

The grant recipient updated the procedure for shared program governance in June 2024. A review of the procedure showed it included clearly defined roles and responsibilities for governing body members.

The human services department division manager stated the layers of shared governance included the governing board, which assumed legal and fiscal responsibility and safeguarded federal and State funds; the Early Head Start governance advisory committee, which assumed responsibility for ensuring comprehensive participation on behalf of Snohomish County; the Human Services Department-Developmental Disabilities and Early Learning Division, which assumed responsibility for day-to-day functions; and the policy council, which involved families and community representatives in program planning, policies, and operation.

Governing body members reviewed the grant recipient's standards of conduct and formal procedures for disclosing, addressing, and resolving any conflict of interest. A review of policy council, advisory committee, and governing board meeting agendas from October 2023 to June 2024 showed all members received information on their roles and responsibilities. In an interview, the Snohomish County Council chairperson stated all governing body members understood their roles and responsibilities.

The grant recipient ensured governing body members did not have a conflict of interest. This area of noncompliance is corrected.

Ongoing Monitoring and Continuous Improvement

The grant recipient does not use data to identify program strengths, needs, and areas needing improvement; to evaluate progress toward achieving program goals and compliance with program performance standards; and to assess the effectiveness of professional development.

FA-2 06/30/2023 ANC 1302.102(c)(2)(i) Timeframe for Correction: 120 days

1302.102 Achieving program goals. (c) Using data for continuous improvement. (2) This process must: (i) Ensure data is aggregated, analyzed and compared in such a way to assist agencies in identifying risks and informing strategies for continuous improvement in all program service areas.

The grant recipient did not ensure data was aggregated, analyzed, and compared to identify risks and inform strategies for continuous improvement in all program service areas.

In a discussion, the Early Head Start director stated, and a review of data confirmed, that the program had not aggregated or analyzed family service and health data at the program level. Staff members used individual family service information to work with each family, but the program had not combined the data to guide continuous improvement. During a review of health outcomes, the Early Head Start director confirmed that during the past year, the program had not aggregated, analyzed, and compared health services data to identify risks and areas of concern.

The grant recipient did not ensure data was aggregated, analyzed, and compared to identify risks and inform strategies for continuous improvement in all program service areas; therefore, it was not in compliance with the regulation.

Follow-up

Corrected

Timeframe for Correction: N/A

The grant recipient aggregated and analyzed data to identify risks and inform strategies for continuous improvement in all program service areas. The grant recipient updated policies and procedures, trained staff, and conducted monitoring.

The grant recipient revised its home visiting content, scheduling, and missed visits policy and procedure in June 2024. A review of the revised document showed the grant recipient would use family and health outcome reports to monitor service delivery, service quality, and compliance with regulations. An infant/toddler specialist stated staff reviewed family goals and assessed outcomes three times a year.

The grant recipient trained staff on tracking and analyzing family and health outcomes data in August 2024. In addition, the grant recipient reviewed and discussed data collection, consistency, and assessment during bimonthly staff meetings. Finally, the ACF Training and Technical Assistance Network provided training to program staff on data monitoring and demographic variables.

The grant recipient monitored family and health outcomes data monthly. Information reviewed included family and health outcomes, family strengths, outcomes, immunizations, and health reports. In addition to staff and managers, the monthly data reports were shared with the governing bodies.

The grant recipient aggregated and analyzed data to identify risks and inform strategies for continuous improvement in all program service areas. This area of noncompliance is corrected.



Monitoring and Implementing Quality Education and Child Development Services

Supporting Teachers in Promoting School Readiness

The grant recipient does not ensure teachers are prepared to implement the curriculum and support children's progress toward school readiness.

FA-2

06/30/2023

ANC

1302.92(c)(1)

Timeframe for Correction: 120 days

1302.92 Training and professional development. (c) A program must implement a research-based, coordinated coaching strategy for education staff that: (1) Assesses all education staff to identify strengths, areas of needed support, and which staff would benefit most from intensive coaching;

The grant recipient did not implement a research-based, coordinated coaching strategy for education staff.

During a discussion, the Early Head Start director stated that the program did not have a coordinated coaching strategy to support education staff. The program also did not assess education staff to identify teachers' strengths and areas in need of support or which education staff would benefit from intensive coaching.

The grant recipient did not implement a research-based, coordinated coaching strategy for education staff; therefore, it was not in compliance with the regulation.

Follow-up

Corrected

Timeframe for Correction: N/A

The grant recipient implemented a research-based, coordinated coaching strategy for education staff. The grant recipient revised policies and procedures, participated in practice-based coaching training, and increased coaching efforts.

The grant recipient revised its intensive/intentional coaching policy to include the use of practice-based coaching and together learning collaboratively groups. The policy also stated that all home visiting staff would identify their strengths and areas of needed support, and the grant recipient would identify which staff would benefit most from ongoing coaching.

Leadership staff participated in practice-based coaching training provided by the ACF Training and Technical Assistance Network. The training focused on positive behaviors, coaching agreements, success rubrics, and inclusion. The grant recipient also provided training to home visiting staff members on practice-based coaching and together learning collaboratively.

The grant recipient monitored coaching activities using a coaching session tracking sheet. A review of the tracking sheet found staff set and reviewed goals and completed coaching agreements in July and August 2024.

Thirteen staff members received coaching during the corrective action period.

The grant recipient implemented a research-based, coordinated coaching strategy for education staff. This area of noncompliance is corrected.



Monitoring and Implementing Fiscal Infrastructure

Budget Planning and Development

The grant recipient does not develop and implement its budget to sustain management, staffing structures, and the delivery of services that support the needs of enrolled children and families.

FA-2 06/30/2023 ANC 642(d)(2)(A)-(I) Timeframe for Correction: 120 days

Sec. 642 Powers and Functions of Head Start Agencies (d) Program Governance Administration- (2) CONDUCT OF RESPONSIBILITIES- Each Head Start agency shall ensure the sharing of accurate and regular information for use by the governing body and the policy council, about program planning, policies, and Head Start agency operations, including-- (A) monthly financial statements, including credit card expenditures; (B) monthly program information summaries; (C) program enrollment reports, including attendance reports for children whose care is partially subsidized by another public agency; (D) monthly reports of meals and snacks provided through programs of the Department of Agriculture; (E) the financial audit; (F) the annual self-assessment, including any findings related to such assessment; (G) the communitywide strategic planning and needs assessment of the Head Start agency, including any applicable updates; (H) communication and guidance from the Secretary; and (I) the program information reports.

The grant recipient did not share accurate and regular information about program planning, policies, and Head Start agency operations for use by the governing bodies.

In an interview, the division manager of early learning stated the program had not regularly supplied financial and programmatic data to either governing body during the past 2 years. A review of a spreadsheet listing advisory committee meeting topics showed that financial statements, credit card expenses, and program information had not been presented regularly to the governing bodies since at least 2019.

Advisory Board members stated that although the program periodically shared programmatic information, including the self-assessment, community needs assessment, open slots, and program goals and updates, they could not recall how often this data was shared. The Board members did not recall receiving financial reports or credit card expenditures. Policy council members also could not remember receiving monthly financial reports, including credit card information or other program reports. The policy council members stated that program staff verbally shared the budget amounts, how much had been spent, and the remaining balance; however, they did not receive any reports to review.

The last documented credit card expense report was presented to the Board on December 21, 2021, and to the policy council on November 16, 2022. The last financial report was presented to the Board on December 7, 2021, and to the policy council on July 14, 2021. The Board meeting minutes from March 31, 2022 and September 8, 2022 confirmed limited discussion about program data.

The grant recipient did not share accurate and regular information about program planning, policies, and Head Start agency operations for use by the governing bodies; therefore, it was not in compliance with the regulation.

Follow-up

Corrected

Timeframe for Correction: N/A

The grant recipient shared accurate and regular information about program planning, policies, and Head Start agency operations with the governing bodies. The grant recipient revised policies and procedures, reported required information, and provided training.

The Early Head Start (EHS) supervisor stated the program reviewed and revised the shared program governance policy and procedures and created a shared governance crosswalk in August 2024. A review of the documents showed they delineated items to be reviewed and approved by the governing bodies and the training the program would provide to members.

The grant recipient provided a monthly program report to the governing board. A review of the May 2024 report found it included personnel actions, program updates, financial data, credit card usage, program enrollment and attendance data, health data, recommendations from the Head Start Advisory Committee, and additional program updates.

A review of documents showed the grant recipient provided training to the governing board and the policy council members on their responsibilities in October 2023, May 2024, and August 2024. In an interview, the Snohomish County Council chairperson stated council members were aware of their roles and responsibilities.

The grant recipient shared accurate and regular information about program planning, policies, and Head Start agency operations with the governing bodies. This area of noncompliance is corrected.

FA-2 06/30/2023 ANC 642(d)(3) Timeframe for Correction: 120 days

Sec. 642 Powers and Functions of Head Start Agencies (d) Program Governance Administration- (3) TRAINING AND TECHNICAL ASSISTANCE- Appropriate training and technical assistance shall be provided to the members of the governing body and the policy council to

ensure that the members understand the information the members receive and can effectively oversee and participate in the programs of the Head Start agency.

The grant recipient did not provide training to the governing bodies to ensure members could effectively oversee and participate in the programs of the Head Start agency.

In an interview, the Advisory Board members stated they had not received training on the Head Start Act, rules, regulations, or their responsibilities. They further stated any knowledge about the budget came from their positions with the county and not from the training provided by the program. To ensure the program complied with federal regulations, Board members relied on the division manager of early learning.

Members of the policy council stated they received partial training at their last meeting; however, the training had not been completed. A review of policy council meeting minutes showed that the only training provided was about the policy council's responsibilities regarding the budget. In a discussion, the division manager of early learning confirmed no additional training had been provided to the policy council or the Board.

The grant recipient did not provide training to the governing bodies to ensure members could effectively oversee and participate in the programs of the Head Start agency; therefore, it was not in compliance with the regulation.

Follow-up

Corrected

Timeframe for Correction: N/A

The grant recipient provided training to the governing body to ensure members understood the information they received and could effectively oversee and participate in the programs of the Head Start agency.

The human services department division manager stated the grant recipient received training and resources from the ACF Training and Technical Assistance Network. The manager also stated the grant recipient provided annual training to the governing board, the policy council, and the advisory committee. A review of documents confirmed training occurred in October 2023 and January, May, and August 2024. Training agendas and documents showed topics included the budget, ERSEA regulations, the strategic plan, and the self-assessment.

The grant recipient provided training to the governing body to ensure members understood the information they received and could effectively oversee and participate in the programs of the Head Start agency. This area of noncompliance is corrected.



Monitoring ERSEA: Eligibility, Recruitment, Selection, Enrollment, and Attendance

Determining, Verifying, and Documenting Eligibility

The grant recipient does not enroll children or expectant mothers who are categorically eligible or who meet defined income-eligibility requirements.

FA-2 06/30/2023 ANC 1302.12(a)(ii) Timeframe for Correction: 120 days

1302.12 Determining, verifying, and documenting eligibility. (a) Process overview. (1) Program staff must: (ii) Verify information as required in paragraphs (h) and (i) of this section.

The grant recipient did not accurately determine, verify, and document eligibility.

In a review of 36 eligibility files, 8 (22%) files contained errors when determining eligibility. Of the eight files, four files contained incorrect or missing income documentation. Of the remaining four files, three were initially determined to be income-eligible, but redeterminations placed them at 100 to 130 percent of poverty. The last file was originally eligible at 100 to 130 percent of poverty, but a recalculation identified it as over-income.

The grant recipient did not accurately determine, verify, and document eligibility; therefore, it was not in compliance with the regulation.

Follow-up

Corrected

Timeframe for Correction: N/A

The grant recipient developed a process to accurately determine, verify, and document eligibility. The program revised policies and procedures, trained staff, and enhanced ongoing monitoring.

The Early Head Start (EHS) supervisor stated the grant recipient revised policies and procedures related to eligibility in October 2023. The grant recipient also revised its ChildPlus eligibility checklist to ensure two staff members confirmed each eligibility determination.

The grant recipient trained all staff on determining eligibility in July 2024. In addition, the EHS supervisor attended ERSEA training.

The grant recipient enhanced monitoring. The infant/toddler specialist reviewed one-third of the eligibility files each quarter to verify accuracy and ensure compliance with all regulations. Monitoring data was shared with the EHS supervisor.

A review of 15 eligibility files showed correct determinations and verification by two staff members.

The grant recipient developed a process to accurately determine, verify, and document eligibility. This area of noncompliance is corrected.

FA-2 06/30/2023 ANC 1302.12(l)-(m) Timeframe for Correction: 120 days

1302.12 Determining, verifying, and documenting eligibility. (l) Program policies and procedures on violating eligibility determination regulations. A program must establish written policies and procedures that describe all actions taken against staff who intentionally violate federal and program eligibility determination regulations and who enroll pregnant women and children that are not eligible to receive Early Head Start or Head Start services. (m) Training on eligibility. (1) A program must train all governing body, policy council, management, and staff who determine eligibility on applicable federal regulations and program policies and procedures. Training must, at minimum: (i) Include methods on how to collect complete and accurate eligibility information from families and third party sources; (ii) Incorporate strategies for treating families with dignity and respect and for dealing with possible issues of domestic violence, stigma, and privacy; and, (iii) Explain program policies and procedures that describe actions taken against staff families, or participants who attempt to provide or intentionally provide false information. (2) A program must train management and staff members who make eligibility determinations within 90 days of hiring new staff. (3) A program must train all governing body and policy council members within 180 days of the beginning of the term of a new governing body or policy council. (4) A program must develop policies on how often training will be provided after the initial training.

The grant recipient did not establish written policies and procedures describing actions against staff who intentionally violated federal and program eligibility regulations.

During an interview, the Early Head Start director stated the program did not have a written policy describing the actions taken against staff who intentionally violated federal and program eligibility regulations. A review of the program's ERSEA policies and procedures confirmed that statement. The director also stated the program did not train staff on the consequences of violating those regulations.

The grant recipient did not establish written policies and procedures describing actions taken against staff who intentionally violated federal and program eligibility regulations; therefore, it was not in compliance with the regulation.

Follow-up

Corrected

Timeframe for Correction: N/A

The grant recipient established written policies and procedures describing actions taken against staff who intentionally violate federal and program eligibility determination regulations. The grant recipient updated policies and trained staff.

The Early Head Start (EHS) supervisor stated the grant recipient revised its eligibility, recruitment, selection, enrollment, and attendance policy in October 2023 to align with its standards of conduct and to include the consequences for staff who intentionally falsify information.

The grant recipient reviewed the revised policy with all staff in October 2023 and June 2024. A review of governing board and policy council meeting minutes showed both entities received information on the revised policy.

The grant recipient trained the governing board and the policy council on eligibility requirements.

The grant recipient established written policies and procedures describing actions taken against staff who intentionally violate federal and program eligibility determination regulations. This area of noncompliance is corrected.

----- End of Report -----