



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](http://eclkc.ohs.acf.hhs.gov)

## Program Performance Summary Report

**To: Authorizing Official/Board Chairperson**

Mr. Dave Somers

County of Snohomish

3000 Rockefeller Ave M//S 305

Everett, WA 98201

**From: Responsible HHS Official**

**Date: 08/11/2023**

**Mr. Khari M. Garvin**

**Director, Office of Head Start**

From June 26, 2023 to June 30, 2023, the Administration for Children and Families conducted a Focus Area Two (FA2) monitoring review of County of Snohomish Early Head Start program. This report contains information about the grant recipient's performance and compliance with the requirements of the Head Start Program Performance Standards (HSPPS) or Public Law 110-134, *Improving Head Start for School Readiness Act of 2007*.

The Office of Head Start (OHS) would like to thank your governing body, policy council, parents, and staff for their engagement in the review process. Based on the information gathered during this review, it has been determined that your program needs improvement in one or more areas. This report provides you with detailed information in each area where program performance did not meet one or more applicable HSPPS, laws, regulations, and policy requirements, and the required timeframes for corrective action.

Please contact your Regional Office for guidance should you have any questions or concerns. Your Regional Office will follow up on the content of this report and can work with you to identify resources to support your program's continuous improvement.

### **DISTRIBUTION OF THE REPORT**

Copies of this report will be distributed to the following:

Mr. Robert Colombini, Regional Program Manager

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

Ms. Kristina Saunsaucie, Early Head Start Director

**Grant(s) included as part of this review**

Grant Recipient Name	Grant Number(s)
County of Snohomish	10CH011314

**Glossary of Terms**

Finding Type	Definition
<p><b>Area of Concern (AOC)</b></p>	<p>An area in which the agency needs to improve performance. These issues should be discussed with the grant recipient's Regional Office for possible technical assistance.</p>
<p><b>Area of Noncompliance (ANC)</b></p>	<p>An area in 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 areas of performance. This status requires a written timeline for correction and possible technical assistance or guidance from the grant recipient's program specialist. If not corrected within the specified timeline, this status becomes a deficiency.</p>
<p><b>Deficiency</b></p>	<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"> <li>(i) a threat to the health, safety, or civil rights of children or staff;</li> <li>(ii) a denial to parents of the exercise of their full roles and responsibilities related to program operations;</li> <li>(iii) a failure to comply with standards related to early childhood development and health services, family and community partnerships, or program design and management;</li> <li>(iv) the misuse of funds received under this subchapter;</li> <li>(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</li> <li>(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;</li> </ul> <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	Grant Number(s)	Compliance Level	Applicable Standards	Timeframe for Correction
Program Management	10CH011314	Area of Noncompliance	642(c)(1)(C)(iii)	120 days
Ongoing Monitoring and Continuous Improvement	10CH011314	Area of Noncompliance	1302.102(c)(2)(i)	120 days
Supporting Teachers in Promoting School Readiness	10CH011314	Area of Noncompliance	1302.92(c)(1)	120 days
Budget Planning and Development	10CH011314	Area of Noncompliance	642(d)(2)(A)-(I)	120 days
Budget Planning and Development	10CH011314	Area of Noncompliance	642(d)(3)	120 days
Determining, Verifying, and Documenting Eligibility	10CH011314	Area of Noncompliance	1302.12(a)(ii)	120 days
Determining, Verifying, and Documenting Eligibility	10CH011314	Area of Noncompliance	1302.12(l)-(m)	120 days

#### Program Overview

County of Snohomish administers Early Head Start programs in rural Washington State, north of Seattle. The grant recipient receives funds to serve 82 infants, toddlers, and expectant families. Services are provided through a home-based option.



## 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.

#### ANC - 642(c)(1)(C)(iii)

*Timeframe for Correction:* 120 days

#### *Citation Definition:*

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).

#### *Monitoring Feedback:*

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.

### 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.

#### ANC - 1302.102(c)(2)(i)

*Timeframe for Correction:* 120 days

#### *Citation Definition:*

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.

#### *Monitoring Feedback:*

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.

**Program Governance**

The grant recipient maintains a formal structure of program governance to oversee the quality of services for children and families and to make decisions related to program design and implementation.

The grant recipient's policy council is engaged in the direction of the program, including program design and planning of goals and objectives.



## Monitoring and Implementing Quality Education and Child Development Services

### **Alignment with School Readiness**

The grant recipient's school readiness efforts align with the expectations of receiving schools, the Head Start Early Learning Outcomes Framework (HSELOF), and state early learning standards.

### **Effective and Intentional Teaching Practices**

Not Applicable.

### **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.

### **ANC - 1302.92(c)(1)**

*Timeframe for Correction:* 120 days

#### ***Citation Definition:***

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;

#### ***Monitoring Feedback:***

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.

### **Home-Based Program Services**

The grant recipient ensures home-based program services provide quality learning experiences through home visits and group socialization activities.



## Monitoring and Implementing Quality Health Services

### Child Health Status and Care

The grant recipient effectively monitors and maintains timely information on children's health statuses and care including ongoing sources of health care, preventive care, and follow-up.

### Mental Health

The grant recipient supports a program-wide culture that promotes mental health and social and emotional well-being, and uses mental health consultation to support staff and families.

### Oral Health and Nutrition

The grant recipient maintains and monitors for effective oral health practices and nutrition services that meet the nutritional needs and accommodate children's feeding requirements and allergies.

### Safety Practices

The grant recipient implements a process for monitoring and maintaining healthy and safe environments.

### Services to Expectant Families

The grant recipient provides and monitors for quality services that facilitate expectant mothers' access to health care and provide information to support prenatal, postpartum, and maternal health as well as infant health and emotional well-being.

## Health Services Summary

County of Snohomish supported the mental health of enrolled children and families. The program employed a bilingual mental health consultant to help meet participants' social-emotional needs. The consultant was available to meet with parents individually to offer personalized resources and suggestions. The mental health consultant also attended home visits upon request to conduct observations and provide feedback to staff and families. Caregivers were referred to additional mental health services within the community when necessary. Additionally, the grant recipient offered monthly parenting workshops focusing on social-emotional issues. These efforts ensured the program promoted the mental well-being of enrolled children and families.



## **Monitoring and Implementing Quality Family and Community Engagement Services**

### **Family Well-Being**

The grant recipient collaborates with families to support family well-being, parents' aspirations, and parents' life goals.

### **Strengthening Parenting and Parent-Child Supports**

The grant recipient provides services that strengthen parent-child relationships and support parents in strengthening parenting skills.

### **Family Engagement in Education and Child Development Services**

The grant recipient provides education and child development services that recognize parents' roles as children's lifelong educators and encourage parents to engage in their children's education.

## **Family and Community Engagement Services Summary**

County of Snohomish implemented strategies and created partnerships to support family well-being. As part of the county, the program was connected to its resource system and had direct access to its network of housing assistance providers and health and family services. Staff were familiar with the agencies available in all communities throughout the service area and worked with representatives from those organizations. Staff also participated in local boards, coalitions, and committees to build relationships with area partners. These collaborations allowed staff to make referrals and involve other agencies in direct services to parents. Additionally, the program used listservs to stay updated on local resources and share information with participants. In this way, the program created a large network of available resources to help families achieve their goals.





## 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.

#### **ANC - 642(d)(2)(A)-(I)**

*Timeframe for Correction:* 120 days

#### ***Citation Definition:***

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.

#### ***Monitoring Feedback:***

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.

#### **ANC - 642(d)(3)**

*Timeframe for Correction:* 120 days

#### ***Citation Definition:***

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.

#### ***Monitoring Feedback:***

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.

**Ongoing Fiscal Capacity**

The grant recipient plans and implements a fiscal management system that supports the organization's ongoing capacity to execute its budget over time and meet the needs of its organization.

**Budget Execution**

The grant recipient's financial management system provides for effective control over and accountability for all funds, property, and other assets.

**Facilities and Equipment**

The grant recipient complies with application, prior approval, and reporting requirements for facilities purchased, constructed, or renovated with Head Start funds.



## 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.

#### ANC - 1302.12(a)(ii)

*Timeframe for Correction:* 120 days

#### *Citation Definition:*

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.

#### *Monitoring Feedback:*

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.

#### ANC - 1302.12(l)-(m)

*Timeframe for Correction:* 120 days

#### *Citation Definition:*

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.

#### *Monitoring Feedback:*

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.

### Enrollment Verification

The grant recipient maintains and tracks enrollment.

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