



ADMINISTRATION FOR
CHILDREN & FAMILIES

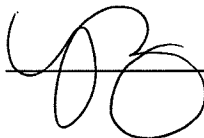
Office of Head Start | 8th Floor Portals Building, 1250 Maryland Ave, SW, Washington DC 20024 | eclkc.ohs.acf.hhs.gov

To: Board Chairperson

*Mrs. Carol Walker
Board Chairperson
Grace Hill Settlement House
2600 Hadley St.
St. Louis, MO 63106-4021*

From: Responsible HHS Official

*Ms. Yvette Sanchez Fuentes
Director, Office of Head Start*

 11/08/13
Date

Notice of Deficiency Requiring Immediate Correction

On 9/20/2013, the Administration for Children and Families (ACF) conducted a review of the Grace Hill Settlement House Head Start program. Based on the information gathered during our review at least one area of deficiency was identified that posed imminent harm or immediate danger to staff and/or children of the Head Start program. When a deficiency of this nature is identified, the Office of Head Start will direct the grantee to take immediate corrective action to ensure staff and children are removed from imminent harm or immediate danger and/or the cause of the imminent harm or immediate danger is corrected.

Distribution of the Head Start Review Report

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

Mr. Clarence Small, Regional Program Manager
Ms. Kenya Conner, Policy Council Chairperson
Mr. Roderick L. Jones, CEO/Executive Director
Mrs. Johanna Wharton, Head Start Director

Overview Information

Review Type:	<i>Other-Offsite</i>
Organization:	<i>Grace Hill Settlement House</i>
Program Type:	<i>Head Start</i>
Team Leader:	<i>Carol Kuhns</i>
Funded Enrollment HS:	<i>1310</i>
Funded Enrollment EHS:	<i>Not Applicable</i>

New Immediate Deficiency Determination(s)

The Review Team Leader has contacted the responsible HHS official, and it was determined that the area(s) of deficiency cited below pose(s) imminent harm or immediate danger to children or staff and must be corrected within 10 days of receipt of this notice. The following constitute(s) deficiency as defined under Sec. 637(2)(A)(i) of the Head Start Act as a threat to the health, safety, or civil rights of children and staff.

Management Systems

Applicable Standards	Program Type	Status	Finding Type
1304.52(i)(1)(iv)	HS	Immediate Deficiency	Human Resources

PART 1304 - Program Performance Standards For Operation Of Head Start Programs By Grantees And Delegate Agencies

1304.52 Human Resources Management.

(i) Standards of conduct.

(1) Grantee and delegate agencies must ensure that all staff, consultants, and volunteers abide by the program's standards of conduct. These standards must specify that
(iv) They will use positive methods of child guidance and will not engage in corporal punishment, emotional or physical abuse, or humiliation. In addition, they will not employ methods of discipline that involve isolation, the use of food as punishment or reward, or the denial of basic needs.

The grantee did not ensure all staff, consultants, and volunteers abided by the program's standards of conduct requiring them to use only positive methods of child guidance and not engage in corporal punishment. A teacher did not use positive methods of child guidance and engaged in corporal punishment.

On September 19, 2013, the grantee's Head Start Director self-reported a September 13, 2013 incident occurring at the Youth in Need delegate's Meramec Head Start center. The Director stated during lunch, a child held food in her mouth but did not swallow it, and the teacher said she placed her hands on the child's cheeks to encourage her to swallow the food. The teacher stated the child pulled away from her, causing her to scratch the child on the cheeks.

The child's mother picked her up during naptime but soon returned to the center and asked to speak to the Center Manager, saying her child was hurt. The Center Manager confirmed the child had scratches on each cheek and bruising on her cheeks consistent with finger indentations.

The Center Manager reported the incident to her supervisor, who reported it to the Chief Program Officer, and the Chief Program Officer placed the teacher on administrative leave/suspension pending investigation. The delegate's President and Chief Executive Officer reported the incident to the grantee September 19, 2013.

In addition, the delegate self-reported the incident to the Department of Social Services Child Abuse and Neglect Hotline as well as to its Licensing Representative. The Department of Social Services conducted an on-site investigation of the incident September 15, 2013, and an

investigation was in progress.

The grantee did not ensure all staff, consultants, and volunteers abided by the program's standards of conduct requiring them to use only positive methods of child guidance and not engage in corporal punishment; therefore, it was not in compliance with the regulation.

Child Health & Safety

Applicable Standards	Program Type	Status	Finding Type
1310.10(g)	HS	Immediate Deficiency	Transportation and Supervision

PART 1310 - Head Start Transportation

1310.10 General.

(g) Each agency must ensure that children are only released to a parent or legal guardian, or other individual identified in writing by the parent or legal guardian. This regulation applies when children are not transported and are picked up from the classroom, as well as when they are dropped off by a vehicle. Agencies must maintain lists of the persons, including alternates in case of emergency, and up-to-date child rosters must be maintained at all times to ensure that no child is left behind, either at the classroom or on the vehicle at the end of the route.

The grantee did not ensure children were released only to a parent or legal guardian or other individual identified in writing by the parent or legal guardian. A child was released to an adult not identified in writing by the parent or legal guardian.

On September 11, 2013, the Head Start Director notified the Regional Office of a September 9, 2013 incident at the Magnolia Head Start Center in which a child was picked up by someone not authorized to do so. The incident occurred during the transition period at about 2:00 p.m., when children were on their cots, and parents began to pick them up. The Head Start Director reported an individual authorized to pick up two children on behalf of a neighbor left the building with two children; however, one was a child she was not authorized to pick up. The teacher confirmed the individual was authorized to pick up the two children, but because her attention was diverted while talking to another parent, she did not notice the individual picked up a child other than the one she was authorized to pick up and left the building with the child.

The individual picking up the two children believed she had the correct children. However, she was unfamiliar with one child because it was her first time picking him up from the classroom. The teacher did not notice the wrong child was picked up until the child's father arrived to pick up his son and found he was not in the classroom. The teacher made several attempts to contact the individual who picked up the child, and after about 10 minutes, the individual returned to the center with the mistakenly picked-up child, who was reunited with his father.

The Head Start Director stated she immediately went to the center and spoke with the father of the child picked up in error and assured him the program had policies and procedures in place to prevent such an incident. The Head Start Director also spoke with the child's mother on the telephone later the same evening. The child returned to the program the following day, and the

teacher was immediately placed on administrative leave.

On September 11, 2013 the Magnolia Center's Facility Director reported the incident to the Child Care Facility Specialist at the Missouri Department of Health and Human Services Section for Child Care Regulation, as well as to the Child Abuse and Neglect Hotline. The Child Care Facility Specialist conducted an announced inspection at the center, obtained written statements, and conducted interviews with the Facility Director and the teacher.

A Substantiated Complaint of Statute or Rule Violations was issued, and required corrections included reviewing all facility policies and licensing rules regarding the release of children and providing an approved training regarding supervision/safety. In addition, the Facility Specialist recommended the grantee review staffing during transition periods. It was determined the grantee's staffing met State staff-to-child ratio requirements, but only one staff member was in the classroom, so the grantee did not follow the Head Start model for staffing at the time of the incident.

The Head Start Director stated the grantee established policies and procedures to prevent anyone except authorized individuals from picking up children, and all staff, including the teacher involved in the incident, received training on the policies and procedures in April 2013 and again at the August in-service training. However, the policies and procedures were not followed as designed in the cited situation.

The grantee did not ensure children were released only to a parent or legal guardian or other individual identified in writing by the parent or legal guardian; therefore, it was not in compliance with the regulation.

Timeframe for Corrective Action

The areas of deficiency must be fully corrected within 10 days from the date you receive this report per Section 641A(e)(1)(B)(i) of the Head Start Act. Correction requires achieving full compliance with the violated requirement(s). If the area(s) of deficiency remain uncorrected beyond the specified timeframe, you will be issued, pursuant to Section 641A(e)(1)(C), a letter stating our intent to terminate the Head Start designation of your agency.

— END OF REPORT —