

THE SCHOOL BOARD OF BROWARD COUNTY, FLORIDA

Academics

Head Start/Early Intervention Department

Revised Head Start (HS) / Early Head Start (EHS) Corrective Action/Quality Improvement Plan

45C.F.R. - 1304.52

(i)(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.

Description of Deficiency: The grantee did not ensure staff used positive methods of child guidance and did not use corporal punishment, emotional or physical abuse, humiliation, unnecessary restraint or isolation.

Two incidents occurred in which children were subjected to punishment, physical and emotional abuse, unnecessary restraint, and isolation.

A review of the Head Start/Early Head Start Program Child Abuse/Neglect Report determined these incidents were reported to the Regional Office more than 3 days after they occurred.

Objective: Compliance with 1304.52(i)(1)(iv) – Standards of conduct regarding child guidance

In response to the Environmental Health and Safety Overview of Findings Federal Monitoring Review visit conducted from 2/9/2015 to 2/13/2015, Broward County Public Schools took action within the following management systems to ensure that all staff, consultants, and volunteers abide by the program's standards of conduct:

- 1. Communication**
- 2. Human Resources**
- 3. Recordkeeping & Reporting**
- 4. Program Governance**
- 5. Ongoing Monitoring**

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1. Communication

Actions Taken	Person(s) Responsible	Documentation	Status	Outcomes
1.1 Notify the Acting Chief Academic Officer, Chief School Performance and Accountability Officer, and Superintendent of Schools via phone of the Immediate Deficiency from the Environmental Health and Safety Overview of Findings.	Head Start/Early Intervention Director	1.1(a) <u>Acting Chief Academic Officer</u> contacted 4/22/15 @ approximately 1:50 p.m. 1.1(b) <u>Chief School Performance and Accountability Officer</u> contacted 4/22/15 @ approximately 7:30 p.m. 1.1(c) <u>Superintendent of Schools</u> contacted 4/22/15 at approximately 7:45 p.m.	Completed 4/22/15	Memo sent to principals regarding reporting requirements (See Action 1.2)
1.2 Inform principals at every HS/EHS site, through an internal memo via the Chief of School Performance and Accountability, that any incident involving suspected abuse, corporal punishment, or humiliation by HS/EHS staff must be reported to the Director of Head Start/Early Intervention immediately, accompanied by a reporting form within 24 hours.	Head Start/Early Intervention Director	1.2(a) Principal Memo outlining procedures (enclosed) 1.2(b) Blank Reporting Form (enclosed) 1.2(c) Initial Principal Email (enclosed)	Completed 4/23/15	Evidence of Principal reporting alleged child abuse and/or neglect to the Head Start/Early Intervention Director same day of reporting.
1.3. Notify the Broward Schools' Chief of Police that the Director of Head Start/Early Intervention must be informed and provided ongoing updates regarding all abuse investigations involving HS/EHS staff. This includes notification of any final determination made in such incidents.	Head Start/Early Intervention Director	1.3(a) Memo to Chief of Police (enclosed) 1.3(b) Email indicating follow through by Broward School's Police Staff (enclosed) 1.3(c) Copy of investigation report (enclosed)	Completed 4/23/15	Broward School's Police staff emailed Special Investigation Unit (SIU) report.
1.4 Inform the School Board Members of Broward County Public Schools (Governing Body) of the Environmental Health and Safety Overview of Findings.	Head Start/Early Intervention Director	1.4(a) Memo to School Board Members (enclosed) 1.4(b) Email to School Board Members (enclosed)	Completed 4/24/15	Newly Aligned Monitoring System School Board Workshop took place on 5/26/15 to review the new Monitoring System, summarize findings, and answer any questions the board members had.
1.5 Inform Cadre Directors and Principals via phone of the findings at the two schools	Head Start/Early Intervention	1.5(a) Head Start/Early Intervention Director spoke with Cadre Director	Completed 4/24/15	Teacher Assistant at Broadview removed from Head Start

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cited in the report.	Director	over Broadview 4/23/15. 1.5(b) Head Start/Early Intervention Director spoke with Broadview Principal 4/24/15. 1.4(c) Head Start/Early Intervention Director spoke with Cadre Director over Quiet Waters 4/24/15. 1.4(d) Head Start/Early Intervention Director spoke with new Quiet Waters Principal 4/24/15.		classroom, even though no probable cause was found by Broward Schools Police. Teacher at Quiet Waters remained on administrative reassignment and will not return to a Head Start classroom should he/she be relieved from administrative assignment.
1.6 Inform Policy Council of the Environmental Health and Safety Overview of Findings as well as the Corrective Action/Quality Improvement Plan so that it can be reviewed and approved. Provide the chair with a copy of the report.	Head Start/Early Intervention Director or designee	1.6(a) Policy Council Minutes (enclosed)	Approved 4/27/15	Corrective Action/Quality Improvement Plan was Approved.
1.7 Answer questions related to the Environmental Health and Safety Review from school board members.	Head Start/Early Intervention Director	1.7(a) Head Start/Early Intervention Director received and answered question emailed from Board Member regarding the report (enclosed)	Completed 4/24/15	Question answered.
1.8 Discuss report, findings, and next steps with School Board Chair via phone.	Head Start/Early Intervention Director	1.8(a) Director discussed the immediate deficiency with the school board chair and next steps as outlined in the report and provided by the Regional Office. Cell phone record attached.	Conducted 4/29/15	Questions answered and next steps outlined, including upcoming School Board Workshop scheduled.

2. Human Resources

Actions Taken	Person(s) Responsible	Documentation	Status	Outcomes
2.1 Develop and disseminate an electronic training (Brainshark) to ensure all HS/EHS staff is fully informed of the cited performance standard and the use of positive methods of child guidance.	Family Services Supervisor, Head Start/ Early Intervention Director	2.1(a) Link to Brainshark Training: http://www.brainshark.com/browardschools/hs-ehschldabs	Completed 4/23/15	See Action 2.3 Outcomes

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2.2 Request via email that all HS/EHS staff and principals view the new training, complete the acknowledgement form, and submit the form to the Head Start/Early Intervention Department.	Head Start/Early Intervention Director	2.2(a) Principal Email (enclosed) 2.2(b)(i-iii) Signed Acknowledgement Forms (schools) (enclosed) 2.2(c) Email to District Staff (enclosed) 2.2(d) Signed Acknowledgement Forms (district) (enclosed) 2.2(e) Child Abuse Viewing Report with Position (enclosed)	Completed 4/23/15	All HS/EHS staff and principals received refresher training (Total 458).
2.3 Send a follow up email directly to principals at every HS/EHS site and Cadre Directors to ensure all stakeholders view the new training by the due date.	Head Start/Early Intervention Director	2.3(a) Email to Principals and Cadre Directors (enclosed)	Completed 4/23/15	Training completed by 389 school-based HS/EHS personnel.
2.4 Add <i>Raising Awareness of Child Abuse Prevention</i> to quarterly Head Start/Early Intervention Department newsletter and disseminate to teachers, teacher assistants, principals, and staff.	Family Services Supervisor, Head Start/Early Intervention Director	2.4(a) Spring Newsletter p.8 (enclosed)	Completed 5/3/15	Ongoing awareness
2.5 Share resources with all staff regarding prevention and positive child guidance strategies and support.	Family Services Supervisor, Head Start/Early Intervention Director	2.5(a) 2015 Prevention Resource Guide: Making Meaningful Connections 2.5(b) Mental Health Awareness Week Email – Staff (enclosed) 2.5(c) Mental Health Awareness Week Email – Teachers, Assistants, Principals (enclosed) 2.5(d) Staff Wellness Week Email – Staff (enclosed) 2.5(e) Staff Wellness Week Email – Teachers, Assistants, Principals (enclosed) 2.5(f) Stress Workbook (enclosed) 2.5(g) Symptoms of Stress (enclosed) 2.5(h) Mental Health Awareness Information with live webcast information (enclosed) 2.5(i) Stress – The Basics (enclosed) 2.5(j) Unhelpful Thought Patterns	Completed 4/22/15 5/5/15 5/11/15 Ongoing	Ongoing awareness; Additional strategies to implement

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		(enclosed) 2.5(k) Ongoing Evidence Document (enclosed)		
2.6 Develop new professional development, included in the new grant year's training and technical assistance plan, focused on social-emotional development and positively handling challenging behaviors.	Head Start/Early Head Start Specialist, Head Start/Early Intervention Director	2.6(a) Training and Technical Assistance Plan (enclosed)	Approved by Policy Council 6/8/15 Approved by School Board 6/23/15	New professional development will be made available to teachers and assistants during the school year.

3. Recordkeeping & Reporting

Actions Taken	Person(s) Responsible	Documentation	Status	Outcomes
3.1 Revise the <i>Alleged Child Abuse Tracking Log</i> to ensure an accurate log of incidents, follow up, and outcomes are recorded and monitored.	Head Start/Early Intervention Director	3.1(a) Revised log format (enclosed)	Completed 4/27/15	Key Management staff informed of changes to ensure future compliance.
3.2 Create <i>Child Abuse/Neglect Reporting Form</i> for Principals reflecting immediate reporting to the Head Start/Early Intervention Director.	Family Services Supervisor, Head Start/Early Intervention Director	3.2(a) Child Abuse/Neglect Reporting Form sent by Principal to Head Start/Early Intervention Director (enclosed) 3.2(b) Principal Email to Head Start/Early Intervention Director (enclosed) See 1.2(b) for Blank Form	Completed 4/22/15	Principal reported incident to the Head Start Director on the same day of it being reported to him.
3.3 Report all incidents to the Program Specialist in the Region IV Office within three calendar days via email.	Family Services Supervisor, Head Start/Early Intervention Director	3.3(a) Completed Reporting Form (enclosed) 3.3(b) Email to OHS Region IV Program Specialist (enclosed)	Ongoing	Family Services Supervisor gathered any additional information needed, completed the Head Start Form, and sent it to the Head Start/Early Intervention Director. The Head Start/Early Intervention Director emailed the completed Child Abuse/Neglect Form to the Regional Office within three calendar days of an alleged or suspected incident.

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4. Program Governance

Actions Taken	Person(s) Responsible	Documentation	Status	Outcomes
4.1 Request Technical Assistance and correspond with Program Specialist and ICF Grantee Specialist to ensure proper corrective action and ongoing compliance.	Head Start/Early Intervention Director	4.1(a) Emails to/from Region IV Program Specialist (enclosed) 4.1(b) Phone calls made on 4/23/15, 4/27/15 (Program Specialist) and 4/24/15, 4/28/15 (ICF Grantee Specialist) – Cell phone records attached for 4/24/15, 4/27/15, 4/28/15	Conducted 4/23/15 – 5/6/15	No recommendations for changes to the draft submitted to Regional Office on 4/27/15.
4.2 Update Standards of Conduct to include the following: - Specific reference to the Director reporting all suspected or alleged child abuse and/or neglect to the HS Regional Office within three days. - Specific reference to annual training on the program's expectations regarding the use of positive child guidance for all teachers, teacher assistants, and district program staff.	Head Start/Early Intervention Director	4.2(a) Previous Standards of Conduct (enclosed) 4.2(b) Updated Standards of Conduct (enclosed)	Completed 4/27/15	Key Management staff informed of changes to ensure future compliance. All new employees and volunteers have and will receive the training upon being hired or placed within the program.
4.3 Submit the Corrective Action/Quality Improvement that Policy Council approved for review and approval to the School Board during a regularly scheduled meeting.	Head Start/Early Intervention Director	4.3(a) School Board Signed Agenda Request Form (enclosed) 4.3(b) School Board Meeting Recap (enclosed)	Approved 5/5/15	Implementation began as outlined throughout.
4.4 Conduct Newly Aligned Monitoring System School Board Workshop to review federal reports and any findings and provide an overview of the new system.	Head Start/Early Intervention Director	4.4(a) School Board Workshop Transmittal 4.4(b) Newly Aligned Monitoring System PowerPoint 4.4(c) School Board Workshop Agenda	Conducted 5/26/15	School Board Members received an overview of the 5 new monitoring reviews and results of the first three reviews conducted, including the Environmental Health and Safety, as well as the implications of the results, including the deficiency.
4.5 Revise Standards of Conduct to ensure specificity in child abuse reporting procedures, chain of command, and process for reporting.	Head Start/Early Intervention Director	4.5(a) Revised Standards of Conduct (enclosed)	Completed 7/10/15	To be reviewed by Policy Council via special meeting called for 7/23/15.

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4.6 Revised Standards of Conduct go to Policy Council 7/23/15 for review and approval; Revised Standards of Conduct then go to School Board Meeting as an emergency approval 7/28/15	Head Start/Early Intervention Director	4.6(a) Rule Making School Board Policy 1001 (enclosed)	7/23/15 – Policy Council review and approval 7/28/15 – School Board Emergency Approval	To be reviewed by School Board Attorney, submitted to Policy Council, and then submitted to the School Board for rule/policy making.
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5. Ongoing Monitoring

Actions Taken	Person(s) Responsible	Documentation	Status	Outcomes
5.1 Fill Compliance Specialist position to provide an additional layer of ongoing monitoring and support for overall program compliance.	Head Start/Early Intervention Director	5.1(a) Job Description (enclosed) 5.1(b) School Board Approval (enclosed) 5.1(c) Board Meeting Recap – G3 (enclosed)	Completed 5/19/15	Additional layer of support and monitoring to ensure program compliance. Implementation in progress. School resumes 8/24/15.
5.2 Restructure Education and Family Services team to reduce the ratio of teachers to Teacher Specialists thus increasing targeted coaching capabilities and direct support. Increase the number of specialized staff members with expertise in challenging behaviors.	Head Start/Early Intervention Director	5.2(a) Included in 15-16 Grant Narrative Organizational Chart (enclosed) 5.2(b) Policy Council Minutes (enclosed) 5.2(c) School Board Signed Agenda Request Form (enclosed) 5.2(d) School Board Meeting Recap EE-16 (enclosed)	Policy Council Approval 6/9/15 School Board Approval 6/23/15	Implementation in progress. Number of teachers for each coach is reduced so they can spend more time coaching and modeling appropriate strategies in each classroom. Additional psychologist position added to provide expertise in crisis cases and assist with individualized behavior plans. School resumes 8/24/15.
5.3 Revise Ongoing Monitoring Plan to reflect updated training, compliance and documentation procedures outlined within.	Compliance Specialist, Head Start/Early Intervention Director	5.3(a) Old Ongoing Monitoring Plan 5.3(b) Revised Ongoing Monitoring Plan	Completed 7/15/15	Implementation in progress.
5.4 Provide ongoing support to teachers and teacher assistants by Teacher Specialists (coaches), Social Workers, and Psychologists who will document all support related to positive guidance in	Curriculum Supervisor, Family Services Supervisor, HS/EHS Specialist,	Three documentation examples of ongoing coaching occurring at all levels of school/family support (enclosed) 5.4(a) Teacher Support	Ongoing	Evidence/examples of positive guidance strategies in documentation 5.4(a-c)

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their onsite contact reports or in the database management system.	Head Start/Early Intervention Director, Compliance Specialist	5.4(b) Principal Consultations 5.4(c) Family Contact and Involvement		
5.5 Monitor training and support provided related to this performance standard and ensure compliance at all times.	Compliance Specialist, Head Start/Early Intervention Director	5.5(a) Ongoing evidence/ documentation - New staff member's acknowledgement (enclosed)	Ongoing	See Action 2.3 Outcomes. Training conducted annually to ensure ongoing awareness and compliance.