Grantee: Broward County School Board Grant Number: 04CH011046/2020

Summary of Findings: 1302.90(c)(1)(ii)(G) Time Frame for Correction: 120 days

Noncompliance 1302.90(c)(1)(ii)(G) Timeframe for Correction: 120 days 1302.90 Personnel policies. (c) Standards of conduct. (1) A program must ensure all staff, consultants, contractors, and volunteers abide by the program's standards of conduct that: (ii) Ensure staff, consultants, contractors, and volunteers do not maltreat or endanger the health or safety of children, including, at a minimum, that staff must not: (G) Physically abuse a child.

The grantee did not ensure all staff, consultants, contractors, and volunteers abided by the program's standards of conduct to not maltreat or endanger the health and safety of children, including, at a minimum, that staff did not physically abuse a child. On February 19, 2020, a Head Start teacher assistant dragged a 3-year-old Head Start child by the arm down the hallway.

*Note: Items in blue are new Actions developed or updated as a result of the Noncompliance finding.

Action Steps	Person	Documentation	Documentation	Ongoing	Time Frame
*	Responsible	(Attachment #)	Specific to Case	Monitoring Plan	
1302.90 Personnel policies					
(c) Standards of conduct					
All policies and procedures were followed up and until discipline for alleged situation	School PrincipalDirector	 1.01 - Head Start Program Policies 1.02 - Head Start Program Procedures 	N/A	N/A	 Procedure revised by district for 2019-2020 school year. Reviewed 8/7/2019
Employee removed from Head Start program and assigned to school administration. Due to COVID-19, final outcome was not completed due to school closure. Will be completed when employee returns to work before Sept 15	• School Principal	N/A	1.03 - Email Confirmation regarding removal of staff member	N/A	Employee removed from classroom on 2/20/2020

Action Steps	Person	Documentation	Documentation	Ongoing	Time Frame
•	Responsible	(Attachment #)	Specific to Case	Monitoring Plan	
Job Descriptions outline child appropriate	• Director	• 1.04 - Sample	• 1.04 Sample	N/A	Job Description
practices to protect the welfare of children.		Job	Job		• Board Approved 4/23/19
		Descriptions	Descriptions		• Reviewed 8/7/19
			(Pages 6-7)		
Head Start district staff participate in	 Head Start 	• 1.05 - Teacher	• 1.06 - Teacher	 Rubrics are 	Developed/
interviews of all job candidates using a pre-	Specialist	Interview	Assistant	tracked in Head	Implemented in 2017
developed interview rubric that outlines	 Teacher 	Rubric	Interview	Start database	
approaches to behavior management.	Specialists	• 1.06 - Teacher	Rubric	and reviewed	Revised 1/2018 to include
		Assistant		prior to hire of	scoring system
		Interview		a candidate	
		Rubric			Teacher Assistant interview
					conducted 9/18/18
Head Start Staff complete a minimum of 15	• All Head	• 1.07 - Sample	• 1.07A -	• Status of	Policy developed in
hours of professional development per year	Start Staff	Professional	Teacher	training is	9/16/2015.
appropriate to their job position and job		Development	Assistant	reviewed and	
requirements.		Audit Report	Training	reported to staff	D 1 : 1 1
A 11-1		• 1.08 –	Transcript	mid-year by	Procedures reviewed and
Added specific language as to what types of		Professional		Compliance	revised 7/2020
courses are accepted as part of the 15-hour requirement for teaching staff and includes		Development		Team	
courses related to challenging behaviors and		Calendar for		• A second	
social emotional learning		2020-2021.		update reminder is sent to staff	
Social chiotional learning				that have not	
				<u> </u>	
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				completed required hours before the end of the school year	

Action Steps	Person	Documentation	Documentation	Ongoing	Time Frame
	Responsible	(Attachment #)	Specific to Case	Monitoring Plan	
Performance Evaluations are conducted annually based on the collective bargaining agreement for each position.	• School Principal	1.09 - Personnel Evaluation Procedures & Timelines 1.10 - Support Personnel Appraisal System Manual 1.11 - Non- Instructional Employee Performance Evaluation	1.11A - Teacher Assistant Performance Review 2017/2018 1.11B - Teacher Assistant Performance Review 2018/2019 1.11C - Teacher Assistant Performance Review 2018/2020	Personnel Records Department collects and keeps track of all non- instructional evaluations	Evaluations Procedures revised by Employee Evaluations Dept 8/2019 for 2019-2020 school year. Procedures reviewed 8/7/2019
 Staff Standards of Conduct have been updated for the 2020-2021 school year to include more specific details of the types of abuse prohibited by all staff and to include that all staff are empowered to report any concerns about another employee or volunteer to their immediate supervisor. Program Procedures have been updated to include the staff Standards of Conduct in their entirety. 	DirectorSeniorComplianceSpecialist	• 1.02 - Head Start Program Procedures	N/A	N/A	Revised 7/2020

Action Steps	Person Responsible	Documentation (Attachment #)	Documentation Specific to Case	Ongoing Monitoring Plan	Time Frame
 All district and school-based staff assigned to Head Start programs will be required to sign and acknowledge understanding of Program Procedures. Policies and Procedures will be made accessible to all employees through the department SharePoint site. 	• All Program Staff	• 1.12 - Procedure Manual Acknowledge- ment Form	N/A	 Audit of staff signatures on the Policies & Procedures acknowledgement form Monitoring of signed acknowledgement forms is ongoing Systematic follow-up process by Compliance Specialists for non-completers New Employee requests to be sent monthly for new staff entering the program throughout the school year 	• Revised 7/2020

Action Steps	Person	Documentation (Attachment #)	Documentation	Ongoing Manitaring Plan	Time Frame				
Responsible (Attachment #) Specific to Case Monitoring Plan (1) A program must ensure all staff, consultants, contractors, and volunteers abide by the program's standards of conduct									
A memo is sent to all school Principals annually outlining the Child Abuse training requirements for school-based staff.	 Senior Compliance Specialist School Principals 	• 1.13 - 20-21 Child Abuse Principal Memo and Incident Reporting Forms	N/A	N/A	• Revised 7/2020				
The mandatory annual Child Abuse Training has been updated to a two-part module covering the following: Part 1: Recognizing the types and signs of abuse, comorbid factors, Head Start Reporting requirements and procedures Part 2: Understanding DRS, Classroom behavior management strategies, Conscious Discipline basics, real-life scenarios. Quizzes were incorporated throughout the training to ensure the viewer's understanding.	 Director Early Head Start Specialist Senior Compliance Specialist 	 1.14 - Child Abuse Part 1 - Recognizing Signs and Reporting Child Abuse in the Home 1.15 - Child Abuse Part 2 - Behavior Management and Abuse Allegations at School 	N/A	 Completion quizzes must be passed 100% in order to be considered in compliance Monitoring of annual child abuse allegation data 	 Training development completed in 2015. Implement revised training in 8/2020. 				

Action Steps	Person	Documentation	Documentation	Ongoing	Time Frame
	Responsible	(Attachment #)	Specific to Case	Monitoring Plan	
Upon completion of the Child Abuse Training, all employees and volunteers agree to the Standards of Conduct by signing the Child Abuse Acknowledgment Form.	• All district staff, Head Start Principals, Head Start Assistant Principals, Head Start Guidance Counselors, Teachers, Teacher Assistants, Relief Paraprofessi onals, Substitutes and Volunteers	 1.02 - Head Start Program Procedures 1.16 - 2020- 21 Child Abuse Training and Standards of Conduct Acknowledge- ment Form 	• 1.16A - 2019- 20 Child Abuse Training and Standards of Conduct Acknowledge- ment Form signed by Teacher Assistant	 Audit of signed acknowledgement forms upon hire and annually, thereafter. Systematic follow-up process by Compliance Specialists for non-completers New Employee requests to be sent monthly for new staff entering the program throughout the school year 	Head Start Child Abuse Procedure completed on 4/22/2015 Reviewed and revised 8/15/2019 Reviewed and revised 6/2020.
Program Procedures to be updated to include the requirement that any video evidence of alleged child abuse be shared with investigators	DirectorSchool Principal	• 1.02 - Head Start Program Procedures	N/A	N/A	Revised 7/2020

Action Steps	Person	Documentation	Documentation	Ongoing	Time Frame				
	Responsible	(Attachment #)	Specific to Case	Monitoring Plan					
(ii) Ensure staff, consultants, contractors, and volunteers do not maltreat or endanger the health or safety of children, including, at a minimum,									
that staff must not: (G) Physically abuse a				1					
All Head Start teachers required to	• Curriculum	• 1.17 - Active	1.17A - Active	• Teacher	August 7, 2019				
provide a copy of their Active Supervision	Supervisor	Supervision	Supervision plan	Specialists and	D : 1 A (10, 2020				
plan. Teacher Specialists reviews each	• Teacher	training	for classroom related to this	teacher review	Revised August 19, 2020				
plan with the teachers.	Specialists	presentation		the plan					
• For the 2020 school year, the Active	• All staff		case	• During					
Supervision Presentation has been created as a Canvas Course, including video clips	funded by the HS			classroom visits					
from ECKLC and a quiz and will be				Teacher Specialists					
required of all Head Start staff annually.	program			Specialists					
required of all fread Start Start allitudity.									
The program will work with Region IV	Curriculum	• 1.08 –	N/A	Audit of	Professional Development				
T/TA to deliver Active Supervision and	Supervisor	Professional		completers in	Calendar completed				
Culture of Safety Training virtually.	 Compliance 	Development		HS database	8/1/2020				
• Training has been added to 2020-2021	Specialists	Calendar for		 Systematic 					
Professional Development Calendar		2020-2021		follow-up					
 Provide training to all new staff hired 				process by					
throughout the year with T/TA support.				Compliance					
• Custodial staff, and food service will also				Specialists for					
be invited to view the training				non-completers					
				 New Employee 					
				requests to be					
				sent monthly for					
				new staff entering the					
				program					
				throughout the					
				school year					

Action Steps	Person Responsible	Documentation (Attachment #)	Documentation Specific to Case	Ongoing Monitoring Plan	Time Frame
 Teacher Coaches are assigned a caseload of classrooms to provide individualized support and oversight. Coaches monitor the implementation of behavior management strategies and provide support, training and guidance to classroom staff. 	 Curriculum Supervisor Teacher Specialists Behavior Specialist 	1.18 - Learning Zone coaching logs	1.18 - Learning Zone coaching logs	The Curriculum Supervisor monitors all coaching documentation on a regular basis. Teacher Specialists are observed and evaluated using an ongoing observation system.	Caseload schedule completed 8/7/2019
• Employee Assistance Program (EAP)	• Benefits Dept	1.19 - SBBC Policy 4307	N/A	• N/A	Policy Adopted 9/15/1983 Reviewed 8/15/2019
District Mindfulness Initiative • Workshops • Trainings • Monthly newsletter • Canvas Course Page: https://browardschools.instructure.com/courses/868545	• School Climate and Discipline Dept	SBBC Mindfulness Initiative Website	N/A	• N/A	Initiative launched 7/2018

Action Steps	Person	Documentation	Documentation	Ongoing	Time Frame
	Responsible	(Attachment #)	Specific to Case	Monitoring Plan	
 Procedure created using Bookings App from Microsoft Outlook to schedule an appointment with a Head Start Social Worker. Head Start staff who need to speak with a Mental Health professional for a personal issue will use Bookings to request a meeting with a Mental Health Professional. Staff will be apprised of EAP services or other outside agencies or community resources available for needs beyond the scope of area of expertise. 	Curriculum SupervisorSocial Workers	 1.02 - Head Start Program Procedures 1.20 - Image of Bookings Link 1.21 - ChildPlus Mental Health Staff Support Form 	N/A	• Monthly mental health contact logs will be generated and reviewed with each mental health provider to review all cases that reflect in the system as completed, follow-up required, and ongoing.	Procedure completed 8/17/2020
 Compliance Specialist with assigned caseloads of classrooms conduct unannounced health and safety monitoring visits throughout the school year. This may include a camera review when the visit occurs during lunch or transition outside of the classroom. Reports of findings and corrective action are sent to the Teacher as well as school and district administration. 	• Compliance Specialists	• 1.22 Health & Safety Ongoing Monitoring Report	• 1.22 Health & Safety Ongoing Monitoring Report	 Reports are reviewed by Senior Compliance Specialist for accuracy and fidelity annually Head Start database reports are used to evaluate data trends. Classrooms identified for follow-up receive a minimum of 2 visits annually. 	Environmental Health and Safety Review revised on 4/23/2015 Head Start Health & Safety Ongoing Monitoring Checklist revised 6/15/2019 Classroom monitored 9/18/2019 CAP follow-up monitoring 11/1/2019

Action Steps	Person Responsible	Documentation (Attachment #)	Documentation Specific to Case	Ongoing Monitoring Plan	Time Frame
 Internal CLASS evaluations are conducted annually by an internal team of CLASS reviewers. Reports are discussed with classroom staff. Data from the CLASS evaluation is aggregated annually in a classroom snapshot that, among other data, helps to drive coaching and professional development 	• CLASS Reviewers • Classroom Staff	• 1.23 – CLASS Observation Summary • 1.24 – 2019- 2020 Classroom Snapshot Report	• 1.23 – CLASS Observation Summary • 1.24 – 2019- 2020 Classroom Snapshot Report	Annually Curriculum Supervisor monitors completion Teacher Specialist reviews and discusses classroom snapshots with teachers annually	Procedure implemented 8/12/2019
 Revisions to Child Abuse Reporting Form: Add a question asking if there is video evidence of the alleged incident Add a question asking if the child was injured and if rescue was called Add a question if the staff member was removed from working with Head Start Create form as an Adobe file which gets emailed directly to Director, Senior Compliance Specialist and Office Manager email and is saved in to a SharePoint database. 	• Director	• 1.13 - 20-21 Child Abuse Principal Memo and Incident Reporting Forms	N/A	N/A	Head Start Child Abuse Reporting Form developed on 4/22/2015 Revised 8/2019 Revised 6/2020

Action Steps	Person	Documentation	Documentation	Ongoing	Time Frame
	Responsible	(Attachment #)	Specific to Case	Monitoring Plan	
Report called in to Florida Department of Children and Families (DCF) hotline, and documentation of call is on the Child Abuse Reporting Form	• School Principal	1.13 - 20-21 Child Abuse Principal Memo and Incident Reporting Form	• 1.13A - Child Abuse Reporting Form for 2-19- 20 incident • 1.25 - DCF Report from alleged incident on 2/19/20	Verify reporting as listed on Reporting form as required	 School Board Policy 5.3 first adopted 9/5/74 Last amended 6/21/2016 Reviewed 7/15/2020
Child Abuse Reporting Form submitted to Head Start Director within 24 hours of incident	• School Principal	1.13 - 20-21 Child Abuse Principal Memo and Incident Reporting Form	• 1.13A - Child Abuse Reporting Form for 2-19- 20 incident	Monitor emails and central SharePoint folder for new reports	Completed 4/23/15 Revised 6/20/2020
School Principal submits an investigation request to the School Board of Broward County's Special Investigative Unit (SIU) using the "Gateway"	• School Principal	1.26 - SIU Gateway Training Manual	• 1.27 - SIU report regarding 2/19/20 incident	N/A	Process revised for 2019-2020 Reviewed 8/7/2019
The School Board of Broward County's Special Investigative Unit (SIU) opens an investigation of the alleged incident.	• SIU Team	N/A	• 1.27 - SIU report regarding 2/19/20 incident	N/A	Process revised for 2019-2020 Reviewed 8/7/2019
Head Start Director will automatically be notified and sent a SIU Report when any alleged incident occurs with a Head Start child	HS DirectorSIU Director	N/A	N/A	Director monitors incoming reports	Implemented 7/31/2020

Action Steps	Person	Documentation	Documentation	Ongoing	Time Frame
	Responsible	(Attachment #)	Specific to Case	Monitoring Plan	
Written statements gathered from alleged perpetrator and witnesses	• School Principal	 1.28 - Assistant Principal Statement 1.29 - Teacher Statement 1.30 - Teacher Assistant Statement 	 1.28 - Assistant Principal Statement 1.29 - Teacher Statement 1.30 - Teacher Assistant Statement 	N/A	Procedure completed 6/20/2020
Teacher Assistant removed from Head Start program and did not pose a threat to Head Start Children.	• School Principal	N/A	 Principal verbally told Director that staff member was removed 1.03 - Email Confirmation regarding removal of staff member 	N/A	Removed from classroom on 2/20/2020
Upon completion of investigation, a due process meeting is held with alleged perpetrator	 School Principal Union Representati ve 	1.31 - Notification of Due Process Meeting for Teacher Assistant	 1.31 - Notification of Due Process Meeting for Teacher Assistant 1.32 - Notification of rescheduling of Due Process Meeting for Teacher Assistant 	All due process documents are placed in the employees' personnel folder at the site and sent to Personnel Records for the official personnel file	Due Process procedure revised 8/2019 Reviewed 8/7/2019

Action Steps	Person	Documentation	Documentation	Ongoing	Time Frame
	Responsible	(Attachment #)	Specific to Case	Monitoring Plan	
Corrective Action is taken based on the	 School 	• 1.33 - Due	Not available at	All disciplinary	Due Process procedure
allegations and findings. Process outlined	Principal	Process	this time. Will be	action documents	revised 8/2019
in Due Process Corrective Action	_	Corrective	issued upon	are placed in the	
Guidelines and include reprimands,		Action	school reopening	employees'	Reviewed 8/7/2019
suspensions and termination.		Guidelines_19	physically	personnel folder at	
		-20	• 1.34 - Email	the site and sent to	
Corrective action was not issued to Teacher			stating that	Personnel Records	
Assistant due to COVID-19 school closure			discipline was	for the official	
and policy to provide corrective in person			rescheduled	personnel file	
			due to school		
			closures		
Director will issue a Final Disposition	• Director	• 1.35 - Final	• N/A	Audit of Final	Developed and
Notice to school Principal with decision of		Disposition		Disposition	implemented 8/2020
whether employee can be returned to Head		Notice		Notices for any	
Start program based on the evidence				open cases	
provided in the case.					

Discipline - Reporting

Noncompliance 1302.102(d)(1)(ii) Timeframe for Correction: 120 days

1302.102 Achieving program goals. (d) Reporting. (1) A program must submit: (ii) Reports, as appropriate, to the responsible HHS official immediately or as soon as practicable, related to any significant incidents affecting the health and safety of program participants, circumstances affecting the financial viability of the program, breaches of personally identifiable information, or program involvement in legal proceedings, any matter for which notification or a report to state, tribal, or local authorities is required by applicable law.

The grantee did not submit reports, as appropriate, to the responsible Health and Human Services (HHS) official immediately or as soon as practicable, related to any significant incidents affecting the health and safety of program participants as required by applicable law. On March 2, 2020, the Director of Head Start/Early Intervention informed the Regional Office via correspondence in the Head Start Enterprise System (HSES) that a teacher assistant dragged a 3-year-old Head Start child down the hallway on February 19, 2020. The Director thought she reported the incident via HSES on February 21, 2020; however, the incident was not submitted. There was no evidence of correspondence from the Director in HSES for the period of January 8 to March 1, 2020.

Action Steps	Person Responsible	Documentation	Documentation Specific to Case	Ongoing Monitoring Plan	Time frame			
1302.102 Achieving program goals. (d) Reporting.								
 Child Abuse allegations are reported to the Child Abuse Hotline. Caller reports DCF information and response to principal 	WitnessPrincipal		• 1.25 - DCF Report from alleged incident on 2/19/20 • 1.36 - DCF staff intake name and number	N/A	Completed 4/23/2015			
 If the allegation involves a staff member, the school principal reports it to Head Start Director via the Child Abuse Administrator reporting form Routing of the form has been revised to include two additional Head Start staff to ensure immediate action 	 Director Senior Compliance Specialist Confidential Secretary 	 1.13 - 20-21 Child Abuse Principal Memo and Incident Reporting Form 1.37 - Email Request for HSES addition 	1.25 - DCF Report from alleged incident on 2/19/20	Incident Checklist	Completed 4/23/2015			

Action Steps	Person Responsible	Documentation	Documentation Specific to Case	Ongoing Monitoring Plan	Time frame
• Incident is reported to Office of Head Start within 3 days of the incident in the HSES system.	Director	HSES System Email to Program Specialist	1.38 - Evidence of timely document creation	Confidential Secretary and Senior Compliance Specialist double- check HSES system for completion	Complete 4/23/2015 Reviewed 6/20/2020
• Director will ensure that proper time is allotted to complete the process to enter all documentation into the HSES system in a timely fashion.	• Director	1.39 - Director's Task List	N/A	Incident Checklist	Complete 6/10/2020
Director will send an email to the program specialist alerting him/her of HSES submission	• Director	Email to Program Specialist	N/A	Incident Checklist	6/30/2020
Confidential Secretary and Senior Compliance Specialist will confirm submission in HSES	Office ManagerSeniorComplianceSpecialist	HSES System	N/A	Incident Checklist	6/10/2020
Head Start Staff follows up with the school principal and School Investigative Unit on an ongoing basis to stay abreast of actions being taken	 Director Senior Compliance Specialist Confidential Secretary Principal SIU Chief 	1.40 - Incident Checklist	All Documentation Specific to this Case previously mentioned.	Incident Checklist	6/30/2020

Action Steps	Person Responsible	Documentation	Documentation Specific to Case	Ongoing Monitoring Plan	Time frame
Revised procedures to include all pertinent documents that need to be collected and reported in HSES including: Completed DCF Report or local law enforcement report Witness statements Alleged perpetrator statement Due Process Memos (if applicable) Disciplinary Action (if applicable) Video Transcript (if applicable) Documents continue to be collected and submitted as the investigation or disciplinary action continues.	 Director Senior Compliance Specialist Confidential Secretary 	• 1.02 - Head Start Program Procedures	• 1.27 - SIU report regarding 2/19/20 incident • 1.28 - Assistant Principal Statement • 1.29 - Teacher Statement • 1.30 - Teacher Assistant Statement • 1.31 - Notification of Due Process Meeting for Teacher Assistant • 1.32 - Notification of rescheduling of Due Process Meeting for Teacher Assistant • 1.32 - Notification of rescheduling of Due Process Meeting for Teacher Assistant	Incident Checklist Document review by Senior Compliance Specialist and Director	Completed 6/30/2020

(1) A program must submit: (ii) Reports, as appropriate, to the responsible HHS official immediately or as soon as practicable, related to any significant incidents affecting the health and safety of program participants, circumstances affecting the financial viability of the program, breaches of personally identifiable information, or program involvement in legal proceedings, any matter for which notification or a report to state, tribal, or local authorities is required by applicable law.

Action Steps	Person Responsible	Documentation	Documentation Specific to Case	Ongoing Monitoring Plan	Time frame
Develop Procedure for Requesting final incident Reports from DCF or local law enforcement • Set up an account with DCF and BSO as a Child Welfare agency • Request Case # from School Principal • After case is complete, go into DCF or BSO site and request report If the investigating agency is not DCF or BSO, contact via phone or email to request report.	• Director	• 1.02 - Head Start Program Procedures	N/A	N/A	Complete 6/24/2020
Obtain and share DCF or local law enforcement agency report of incident investigation	• Director	N/A	1.25 - DCF Report from alleged incident on 2/19/20	N/A	Complete 6/24/2020

Signature of Policy Council Chair:		Date
Signature of Policy Council Secretary:		Date