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 Monitoring Plan	Time Frame
1202 00 Demonral nations	Responsible	(Attachment #)	Specific to Case	Monitoring Plan	
1302.90 Personnel policies					
(c) Standards of conduct	1	1	1	1	
All policies and procedures were followed up and until discipline for alleged situation	 School Principal Director 	 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. Employee Corrective Action completed on 8/24/2020 Employee no longer working with Head Start program.	• School Principal		 1.03 - Email Confirmation regarding removal of staff member 1.03a - Email confirmation of employee corrective 	N/A	 Employee removed from classroom on 2/20/2020 Employee received corrective action on 8/25//2020

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

Action Steps	Person Responsible	Documentation (Attachment #)	Documentation Specific to Case	Ongoing Monitoring Plan	Time Frame
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 2019/2020 	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. 	 Director Senior Compliance Specialist 	• 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 acknowledge- ment form Monitoring of signed acknowledge- ment 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 Responsible	Documentation (Attachment #)	Documentation Specific to Case	Ongoing Monitoring Plan	Time Frame
(1) A program must ensure all staff, consul	tants, contractor	rs, and volunteers	abide by the progra	m's standards of co	nduct
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 Responsible	Documentation (Attachment #)	Documentation Specific to Case	Ongoing Monitoring Plan	Time Frame
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 acknowledge- ment 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	 Director School Principal 	• 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				
(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.									
 All Head Start teachers required to provide a copy of their Active Supervision plan. Teacher Specialists reviews each plan with the teachers. For the 2020 school year, the Active Supervision Presentation has been created as a Canvas Course, including video clips from ECKLC and a quiz and will be required of all Head Start staff annually. 	 Curriculum Supervisor Teacher Specialists All staff funded by the HS program 	• 1.17 - Active Supervision training presentation	1.17A - Active Supervision plan for classroom related to this case	 Teacher Specialists and teacher review the plan During classroom visits Teacher Specialists 	August 7, 2019 Revised August 19, 2020				
 The program will work with Region IV T/TA to deliver Active Supervision and Culture of Safety Training virtually. Training has been added to 2020-2021 Professional Development Calendar Provide training to all new staff hired throughout the year with T/TA support. Custodial staff, and food service will also be invited to view the training 	 Curriculum Supervisor Compliance Specialists 	• 1.08 – Professional Development Calendar for 2020-2021	N/A	 Audit of completers in HS database 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 	Professional Development Calendar completed 8/1/2020				

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 <u>Mindfulness</u> <u>Initiative</u> <u>Website</u>	N/A	• N/A	Initiative launched 7/2018

Action Steps	Person Responsible	Documentation (Attachment #)	Documentation Specific to Case	Ongoing Monitoring Plan	Time Frame
 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 Supervisor Social 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 Responsible	Documentation (Attachment #)	Documentation Specific to Case	Ongoing Monitoring Plan	Time Frame
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 Responsible	Documentation (Attachment #)	Documentation Specific to Case	Ongoing Monitoring Plan	Time Frame
Written statements gathered from alleged perpetrator and witnesses	School Principal	 (Attachment #) 1.28 - Assistant Principal Statement 1.29 - Teacher Statement 1.30 - Teacher Assistant Statement 	 I.28 - Assistant Principal Statement I.29 - Teacher Statement I.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 Manitaring Blan	Time Frame
Corrective Action is taken based on the allegations and findings. Process outlined in Due Process Corrective Action Guidelines and include reprimands, suspensions and termination. Corrective action was not issued to Teacher Assistant due to COVID-19 school closure.	 Responsible School Principal 	(Attachment #) • 1.33 - Due Process Corrective Action Guidelines_19 -20	Specific to Case Not available at this time. Will be issued upon school reopening 1.34 - Email stating that discipline was rescheduled due to school closures	Monitoring Plan All disciplinary action 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
Director will issue a Final Disposition Notice to school Principal with decision of whether employee can be returned to Head Start program based on the evidence provided in the case.	• Director	• 1.35 - Final Disposition Notice	• N/A	Audit of Final Disposition Notices for any open cases	Developed and implemented 8/2020

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) Re	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 Manager Senior Compliance Specialist 	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 	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