



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

Program Performance Summary Report

To: Authorizing Official/Board Chairperson

Mr. H.A. "Buck" Wenzel

Upper Arkansas Area Council of Governments

1718 Brookside Ave

Canon City, CO 81212 - 5165

From: Responsible HHS Official

Date: 04/03/2024

Mr. Khari M. Garvin

Director, Office of Head Start

From February 20, 2024 to February 22, 2024, the Administration for Children and Families (ACF) conducted a Focus Area One (FA1) monitoring review of Upper Arkansas Area Council of Governments. 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 leadership and management team and staff for their engagement in the review process. Based on the information gathered during this review, it has been determined that your program has at least one area of noncompliance.

This report provides you with detailed information in each area where program performance did not meet applicable Head Start Program Performance Standards, laws, regulations, and policy requirements.

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:

Ms. Cheryl Lutz, Regional Program Manager

Ms. Heather Evans, Chief Executive Officer/Executive Director

Mrs. Christina "Chris" Henager, Head Start Director

Grant(s) included as part of this review

Grant Recipient Name	Grant Number(s)
Upper Arkansas Area Council of Governments	08CH012239

Glossary of Terms

Term	Definition
Area of Concern (AOC)	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.
Area of Noncompliance (ANC)	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.
Deficiency	<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"> (i) a threat to the health, safety, or civil rights of children or staff; (ii) a denial to parents of the exercise of their full roles and responsibilities related to program operations; (iii) a failure to comply with standards related to early childhood development and health services, family and community partnerships, or program design and management; (iv) the misuse of funds received under this subchapter; (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 (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; <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>

How To Read This Report

The Focus Area 1: Foundational Review Report includes the following sections:

- **Program Overview**, provides a summary describing the grant recipient.
- **Performance Summary**, provides a table view of compliance by Performance Area.
- **Review Details**, provides details on the grant recipient performance in each Content Area, Performance Area, and Performance Measure.

Program Overview

Upper Arkansas Area Council of Governments is located in south central Colorado. The grant recipient receives Head Start funding to serve 157 children in a center-based option. Programming is provided at a site in rural Fremont County.

Performance Summary

This section contains an overview of compliance information identified in each Performance Area for all Content Areas. Detailed information can be found in the Review Details section.

Compliance Information

Content Area	Performance Area	Grant Number(s)	Compliance Level	Applicable Standards	Timeframe for Correction
Health Services	Safe and Sanitary Environments	08CH012239	Area of Noncompliance	1302.90(b)(1)	120 days
Health Services	Safe and Sanitary Environments	08CH012239	Area of Noncompliance	1302.90(b)(5)	120 days

Review Details

This section of the report provides details on grant recipient performance in each Content Area, Performance Area, and Performance Measure.

- Each Performance Area includes the compliant Performance Measures monitored in this review.
- If there are any findings, they will be listed within that Performance Area.



Program Design, Management, and Improvement

Below is a list of all Performance Areas and compliant Performance Measures monitored in this Content Area, with details on findings as applicable.

Performance Area: Program Design and Strategic Planning

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient has an established process for using data to monitor performance and progress toward goals and inform continuous improvement.
- The grant recipient's program structure and systems are designed to be responsive to community needs and informed by community strengths and resources.

Performance Area: Program Governance

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient has strategies to support collaboration across program staff, the governing body, and the policy council to facilitate effective program governance.
- The grant recipient establishes program governance with sufficient expertise and representation that supports effective program oversight and engagement with families and the community.

Performance Area: Staffing and Staff Supports

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient has a defined approach for ongoing supervision and support of staff.
- The grant recipient's leadership and management team have clearly defined roles and responsibilities and the appropriate experience to execute Head Start program operations.



Education and Child Development Services

Below is a list of all Performance Areas and compliant Performance Measures monitored in this Content Area, with details on findings as applicable.

Performance Area: Curricula, Screening, and Assessment Tools

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient uses research-based and culturally appropriate curricula to support child outcomes.
- The grant recipient uses appropriate ongoing child assessment tools to understand and support children's abilities and progress and to individualize for every child.
- The grant recipient uses appropriate screening tools to refer children as indicated for evaluation.

Performance Area: Teaching Strategies and Learning Environments

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient develops engaging learning environments that promote healthy development for enrolled children.
- The grant recipient staff identify effective teaching strategies that are responsive to children's needs.

Performance Area: Qualifications, Professional Development, and Coaching

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient has qualified education staff.
- The grant recipient establishes a system of professional development to support delivery of quality education and child development services.
- The grant recipient uses a research-based coaching strategy to support education staff to use effective teaching practices.



Health Services

Below is a list of all Performance Areas and compliant Performance Measures monitored in this Content Area, with details on findings as applicable.

Performance Area: Child Health and Oral Health Status and Care

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient has a process to ensure children become and remain up-to-date on medical and oral health care, including needs for referrals and follow-up care.

Performance Area: Mental Health and Social and Emotional Well-Being

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient develops a positive program environment, in partnership with a qualified mental health consultant, that promotes the mental health and social emotional well-being of children.
- The grant recipient develops positive discipline policies and practices that prohibit the use of expulsion and suspension.

Performance Area: Safe and Sanitary Environments

Area of Noncompliance - 1302.90(b)(1)

Summary

Grant Number(s) Cited: 08CH012239

Timeframe for Correction: 120 days

Performance Standard Details

Regulation Text: 1302.90 Personnel Policies. (b) Background checks and selection procedures. (1) Before a person is hired, directly or through contract, including transportation staff and contractors, a program must conduct an interview, verify references, conduct a sex offender registry check and obtain one of the following: (i) State or tribal criminal history records, including fingerprint checks; or, (ii) Federal Bureau of Investigation criminal history records, including fingerprint checks.

Compliance Details

- The grant recipient did not ensure all staff obtained a complete background check prior to hire.

Additional details from this review event:

- The grant recipient's criminal record check tracking sheet showed it did not obtain a complete background check for 6 of 6 employees hired within the last 12 months prior to hire.
- The grant recipient did not obtain a sexual offender registry check and a child abuse and neglect state registry check for three of the staff members.
- In addition, the grant recipient did not receive fingerprint checks for the 6 staff members until 8 to 16 days after their start date.

Area of Noncompliance - 1302.90(b)(5)

Summary

Grant Number(s) Cited: 08CH012239

Timeframe for Correction: 120 days

Performance Standard Details

Regulation Text: 1302.90 Personnel policies. (b) Background checks and selection procedures. (5) A program must conduct the complete background check for each employee, consultant, or contractor at least once every five years which must include each of the four checks listed in paragraphs (b)(1) and (2) of this section, and review and make employment decisions based on the information as described in paragraph (b)(3) of this section, unless the program can demonstrate to the responsible HHS official that it has a more stringent system in place that will ensure child safety.

Compliance Details

- The grant recipient did not conduct a complete background check for each employee, consultant, or contractor at least once every 5 years.

Additional details from this review event:

- The grant recipient's criminal record check tracking showed it did not obtain an updated criminal record check for 3 of 30 employees every 5 years.
- The 3 employees' latest criminal record checks were completed between July 2017 and October 2018.
- The director confirmed that the grant recipient overlooked the employees' due dates, but an appointment had been scheduled to complete the checks on February 28, 2024.

Performance Area: Expectant Families

Not applicable



Family and Community Engagement Services

Below is a list of all Performance Areas and compliant Performance Measures monitored in this Content Area, with details on findings as applicable.

Performance Area: Program Foundations to Support Family Well-Being and Family Engagement

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient has strategies to engage all families through open and responsive communication.
- Staff are qualified to support the needs of enrolled families.

Performance Area: Family Partnerships

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient develops a family partnership process that is anchored in family strengths, interests, and needs.

Performance Area: Promoting Strong Parenting, Parent-Child Relationships, and Engagement in Children's Learning

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient builds on parents' knowledge and offers parents the opportunity to practice parenting skills.

Performance Area: Community Partnerships

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient develops community partnerships that meet the needs and interests of families.



Fiscal Infrastructure

Below is a list of all Performance Areas and compliant Performance Measures monitored in this Content Area, with details on findings as applicable.

Performance Area: Budget Development, Implementation, and Oversight

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient establishes a transparent, data-informed process to develop and maintain a budget that aligns with program goals and circumstances.

Performance Area: Comprehensive Financial Management Structure and System

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient develops a system to ensure effective control over and accountability for all funds, property, and assets.
- The grant recipient develops a system to ensure that only allowable costs are charged to the Head Start award in accordance with Federal statutes, regulations, and the terms and conditions of the Federal award.
- The grant recipient develops a system for maintaining financial records and generating information needed to manage Federal funds.



Eligibility, Recruitment, Selection, Enrollment, and Attendance

Below is a list of all Performance Areas and compliant Performance Measures monitored in this Content Area, with details on findings as applicable.

Performance Area: Eligibility

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient has an established process for enrolling eligible families and supporting compliance with eligibility requirements.

Performance Area: Recruitment

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient uses knowledge about the community it serves to develop its recruitment strategy to locate families with the greatest need.

Performance Area: Selection

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient uses knowledge about the community it serves to develop its selection criteria.

Performance Area: Enrollment

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient develops a process to maintain enrollment and track current enrollment, including the percentage of enrolled children eligible for services under the Individuals with Disabilities Education Act (IDEA).

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