Federal Monitoring
Grace Hill had an unannounced monitoring visit in November 2011 and the CLASS review was completed in February 2012. The report cited the home-based program as a strength, due to meeting the needs of a diverse, multicultural population. There were eight areas of non-compliance, all of which have been addressed as described below. In addition, the management structure is being reorganized with three additional positions being added to strengthen the monitoring of partners and delegate.

Responses to Cited Areas of Non-Compliance

1304.20(b)(1): The grantee did not perform or obtain screening procedures to identify concerns regarding developmental, sensory, behavioral, motor, language, social and emotional skills within 45 days of children’s entry into the program. 15% of files checked were missing a required screening.
Response: Training is being conducted in August 2012 with grantee, partner and delegate managers to reinforce the need to be in compliance. A calendar will be provided with the dates that requirements are due. The Center staff, Compliance Specialist and ERSEA Director will monitor weekly through file checks and Child Plus reports, providing feedback and support in creating corrective action plans.

1304.23(b)(1): The grantee did not design and implement a nutrition program to meet the nutritional needs and feeding requirements of each child enrolled in a full day classroom.
Response: The grantee staff met with SLPS leadership, including the superintendent. The SLPS program will no longer solicit any food or supplies from parents of Head Start children. The SLPS program offers a full-day pre-school experience, though it is not considered a full-day Head Start program. SLPS receives reimbursement for meals through the School Lunch Program and that program does not reimburse for snacks, unless it is outside of the school day. Grace Hill staff is working with SLPS staff to resolve this issue.

1304.52(g)(5): The grantee did not ensure that staff supervised the outdoor play area at the SLPS Jefferson site so children’s safety was easily monitored and ensured.
Response: SLPS will attend a training September 21 on playground supervision and monitoring. Grantee’s Education Compliance Specialist will monitor playground activities during quarterly site observations.

641A(g)(1): The grantee did not conduct a comprehensive Self-Assessment regarding the effectiveness and progress of its SLPS partner in meeting program goals and in complying with all Federal regulations.
Response: Self-Assessment for program year 2011-2012 included participation from staff, partners, delegate, and board members. Parent Satisfaction Surveys were distributed to all parents in the program and over 400 were returned, representing all grantee, partner and delegate sites. The ECERS (Early Childhood Environmental Rating Scale) was conducted at all grantee, delegate and partner sites excluding public schools. Classroom observations at public schools were completed with a grantee developed observation form. Kindergarten readiness progress was collected for all partner, delegate and grantee children, again excluding public schools. Aggregate data from all the pre-k classrooms at SLPS is being collected and analyzed to align it with Grace Hill kindergarten readiness goals. For program year 2012-2013, grantee will receive aggregate data for Head Start children enrolled in SLPS Head Start Collaboration classrooms.
641A (g)(3): The grantee did not establish and implement monitoring procedures to ensure SLPS partner’s operations effectively implemented Federal regulations.
Response: An Education Compliance Specialist, Director of Early Childhood Services and a St. Louis Public Schools Integration Specialist are being added to the management structure to ensure efficient and effective monitoring.

641A(h)(2)(A): The grantee did not ensure enrollment data reported to the ACF Regional office matched the enrollment data maintained by the program.
Response: Enrollment reports are generated using Child Plus Report 2005: End of the Month Enrollment. A copy of the report is maintained by the management staff in charge of ERSEA.

648A(f): The grantee did not create professional development plans for all grantee and delegate agency staff providing direct services to children.
Response: Training is being conducted in August 2012 with grantee, partner and delegate staff. Each manager will receive an updated Professional Development Plan to be completed for each staff. Monitoring of plans will be added to the monthly monitor form.

648A(g)(3)(A): Grantee did not obtain Criminal Record Checks for all direct staff prior to hire.
Response. Policies and Procedures were revised to ensure CRCs are completed before staff is hired at grantee, partner and delegate sites. Monitoring of CRC’s for new hires is added to the monthly monitoring form.