



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. LaRese Purnell
StepForward
1801 Superior Ave E
Ste 400
Cleveland, OH 44114 - 2135

From: Responsible HHS Official

Date: 11/15/2024

Mr. Khari M. Garvin
Director, Office of Head Start

During the week of October 25, 2024, the Administration for Children and Families (ACF) conducted a monitoring review of StepForward to determine whether the previously identified finding(s) had been corrected. The Office of Head Start (OHS) would like to thank your governing body, policy council, staff, and parents of your program for their cooperation and assistance during the review. This monitoring report has been issued to Mr. LaRese Purnell, Authorizing Official/Board Chair, as legal notice to your agency of the results of the program review.

Based on the information gathered during this review, we have closed the previously identified finding(s) which are included in this report. Any open finding previously identified but not discussed in this report will remain open. The grant recipient will receive a Follow-up review to determine the compliance status of those findings.

Please contact your Regional Office with any questions or concerns you may have about this report.

DISTRIBUTION OF THE REPORT

Copies of this report will be distributed to the following:

Ms. Karen McNamara, Regional Program Manager
Dr. Jacklyn Chisholm, Chief Executive Officer/Executive Director
Dr. Thea Wilson, Head Start Director
Dr. Thea Wilson, Early Head Start Director

Grant(s) included as part of this review

Grant Recipient Name	Grant Number(s)
StepForward	05CH012488

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.
Corrected	The original finding identified has been reviewed, along with any applicable supporting evidence, and now meets the requirements of the applicable regulation.
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>
Uncorrected	The original finding identified has been reviewed, along with any applicable supporting evidence, and does not meet the requirements of the applicable regulation.

Performance Summary

This section contains an overview of compliance information determined through this review. Detailed information can be found in the Review Details section.

Content Area	Performance Area	Applicable Standards	Grant Number(s)	Primary Review Finding Status	Timeframe for Correction	Follow-up Compliance Level
Significant Health and Safety Incidents	Safety Practices	1302.90(c)(1)(ii)	05CH012488	DEF	N/A	Corrected

Review Details

This section of the report provides details on grant recipient performance in each Content Area and Performance Area with a previous or new finding.

Significant Health and Safety Incidents

Included below are details on any relevant findings within this Content Area.

Performance Area: Safety Practices

Follow-up Details

Corrected - 1302.90(c)(1)(ii)

Summary

Grant Number(s) Cited: 05CH012488

Timeframe for Correction: N/A

Performance Standard Details

Regulation Text: 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: (A) Use corporal punishment; (B) Use isolation to discipline a child; (C) Bind or tie a child to restrict movement or tape a child's mouth; (D) Use or withhold food as a punishment or reward; (E) Use toilet learning/training methods that punish, demean, or humiliate a child; (F) Use any form of emotional abuse, including public or private humiliation, rejecting, terrorizing, extended ignoring, or corrupting a child; (G) Physically abuse a child; (H) Use any form of verbal abuse, including profane, sarcastic language, threats, or derogatory remarks about the child or child's family; or, (I) Use physical activity or outdoor time as a punishment or reward.

Compliance Details

Based on the Follow-up review, this finding has been corrected.

- The grant recipient ensured staff members and other adults connected to the program did not maltreat or endanger the health or safety of children.

Additional details from this review event:

- The grant recipient updated policies, trained staff, and conducted monitoring.
- In an interview, the quality assurance manager stated the standards of conduct were revised to require that volunteers, contractors, and consultants be held to the same standards as staff.
- A review of the standards of conduct confirmed staff, contractors, consultants, and volunteers were all included and held to the same standards. The review also showed staff, contractors, consultants, and volunteers must not use corporal punishment with children.
- A review of the grant recipient's tap-out policy showed that teachers can request temporary relief from duties in cases of emergency, health issues, or personal need. Additionally, the grant recipient tracked policy usage through the tap-out report submitted to the site administrator.
- Staff were retrained on appropriate interactions with children. A review of training documents and sign-in sheets showed that training was provided on addressing child incidents through a culture of safety, partnering with parents to create physically and emotionally safe learning environments, and using strategies to create positive learning environments for children and staff. In an interview, the service manager confirmed the training occurred.
- In an interview, the early childhood manager stated the grant recipient conducted formal and informal monitoring. Site administrators completed daily walk-throughs in each classroom to check in with staff.

Additionally, the site administrators completed comprehensive observations twice per year to observe classroom environments and teacher interactions. A review of completed classroom observation forms confirmed the monitoring events occurred.

- In an interview, the board chairperson stated ongoing communication occurred between the grant recipient, the policy council, and the governing board related to the reporting of incidents, discussion of root causes and corrective actions, and approval of the corrective action plans by both governing bodies. A review of meeting minutes confirmed the involvement of the governing board and policy council.

Initial Finding

Parent Review Type: RAN - **Parent Review Date:** 05/15/2024

Parent Review Finding Level: DEF - **Performance Standard Number:** 1302.90(c)(1)(ii)

Grant Number(s) Cited: 05CH012488

Timeframe for Correction: 30 days

Performance Standard Details

Regulation Text: 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: (A) Use corporal punishment; (B) Use isolation to discipline a child; (C) Bind or tie a child to restrict movement or tape a child's mouth; (D) Use or withhold food as a punishment or reward; (E) Use toilet learning/training methods that punish, demean, or humiliate a child; (F) Use any form of emotional abuse, including public or private humiliation, rejecting, terrorizing, extended ignoring, or corrupting a child; (G) Physically abuse a child; (H) Use any form of verbal abuse, including profane, sarcastic language, threats, or derogatory remarks about the child or child's family; or, (I) Use physical activity or outdoor time as a punishment or reward.

Compliance Details

- The grant recipient did not ensure all staff abided by the standards of conduct to refrain from maltreating and endangering the health and safety of children, including using physical abuse.

Additional details from this review event:

- The grant recipient had an incident where an assistant teacher used unacceptable discipline methods with a child at the George Forbes Center. The grant recipient had multiple discipline incidents within the past 12 months.
- On April 25, 2024, an assistant teacher slapped a child in the face after the child scratched another child. A review of photographs found red marks on the child's face.
- Previous incidents of child maltreatment were reported to have occurred during October 2023, and February 2024.

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