



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of Head Start | 330 C St., SW, 4th Floor, Washington DC 20201 | eclkc.ohs.acf.hhs.gov

October 05, 2022

StepForward

Re: Grant No. 05CH010828

Dear Head Start Grant Recipient:

The Administration for Children and Families (ACF), Office of Head Start (OHS) recently conducted a monitoring review of your program. The attached report contains information about your agency's performance and compliance with the requirements of the Head Start Program Performance Standards, Public Law 110-134, Improving Head Start for School Readiness Act of 2007, and other applicable regulations.

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.

If the report has findings the corrective action period will begin 72 hours from the time this email was sent.

Sincerely,

OHS Monitoring Team



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

Ms. Kathryn Hall

StepForward

1801 Superior Ave E

Ste 400

Cleveland, OH 44114 - 2135

From: Responsible HHS Official

Date: 10/04/2022

Katie Hamm

Acting Director, Office of Head Start

From September 15, 2022 to September 21, 2022, the Administration for Children and Families (ACF) conducted a monitoring review of StepForward Head Start and Early Head Start programs to determine whether the previously identified findings 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 Ms. Kathryn Hall, 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 findings which are included in this report. For any previous findings that are not included in this report and remain open, the recipient will receive a future follow-up review to determine the compliance status of those findings.

Please contact your Regional Office for guidance should you have any questions or concerns.

DISTRIBUTION OF THE REPORT

Copies of this report will be distributed to the following recipients:

Mr. Desmond Clayton, Acting Regional Program Manager

Dr. Jacklyn Chisholm, Chief Executive Officer/Executive Director

Dr. Thea Wilson, Head Start Director

Dr. Thea Wilson, Early Head Start Director

Glossary of Terms

Compliant	No findings. Meets requirements of Head Start Program Performance Standard.
Area of Concern	An area for which the agency needs to improve performance. These issues should be discussed with the recipient's Regional Office of Head Start for possible technical assistance.
Area of Noncompliance	An area for 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 area of performance. This status requires a written timeline of correction and possible technical assistance or guidance from the 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>

Performance Summary

Service Area	Applicable Standards	Grant Number(s)	Primary Review Finding Status(s)	Timeframe for Correction	Follow-up Compliance Level
Monitoring and Implementing Fiscal Infrastructure	1303.46(b)(1)-(4)	05CH010828	ANC	N/A	Corrected



Monitoring and Implementing Fiscal Infrastructure

Facilities and Equipment

The recipient does not comply with application, prior approval, and reporting requirements for facilities purchased, constructed, or renovated with Head Start funds.

FA-2 03/25/2022 ANC 1303.46(b)(1)-(4) Timeframe for Correction: 120 days

1303.46 (b) Recording notices of federal interest. (1) If a grantee uses federal funds to purchase real property or a facility, excluding modular units, appurtenant to real property, it must record a notice of federal interest in the official real property records for the jurisdiction where the facility is or will be located. The grantee must file the notice of federal interest as soon as it uses Head Start funds to either fully or partially purchase a facility or real property where a facility will be constructed or as soon as it receives permission from the responsible HHS official to use Head Start funds to continue purchase on a facility. (2) If a grantee uses federal funds in whole or in part to construct a facility, it must record the notice of federal interest in the official real property records for the jurisdiction in which the facility is located as soon as it receives the notice of award to construct the facility. (3) If a grantee uses federal funds to renovate a facility that it, or a third party owns, the grantee must record the notice of federal interest in the official real property records for the jurisdiction in which the facility is located as soon as it receives the notice of award to renovate the facility. (4) If a grantee uses federal funds in whole or in part to purchase a modular unit or to renovate a modular unit, the grantee must post the notice of federal interest, in clearly visible locations, on the exterior of the modular unit and inside the modular unit.

The recipient did not file the notice of federal interest when it purchased real property.

The recipient was unable to provide documentation that it had filed a notice of federal interest. However, a document review showed that the recipient had included federal interest in their last SF-429A filed on April 20, 2021. In an interview, the fiscal staff confirmed the recipient owned three centers with federal interest but was not able to provide documentation that the notice had been filed.

The recipient did not file the notice of federal interest when it purchased real property; therefore, it was not in compliance with the regulation.

Follow-up

Corrected

Timeframe for Correction: N/A

The recipient filed its required Notices of Federal Interest and established a process to ensure additional notices would be filed if required.

In an interview, the chief financial officer (CFO) stated the program created a policy and procedure to ensure compliance with the requirement to file Notices of Federal Interest (NOFI) for properties acquired or improved with Federal funds. Further, the program filed the NOFI for three of its properties with Federal interest. The program provided a copy of the filed NOFI for each property, a copy of the revised policy and procedure, and evidence of internal monitoring for review.

The CFO also stated that he and other members of management received training from the Head Start Training and Technical Assistance Network in June and August 2022 on complying with the regulation and creating a comprehensive corrective action plan. The CFO added that he provided training to other members of the staff and the governing body. The program provided documentation of training.

In the interview, the Board chair stated the Board provided oversight and guidance throughout the period of correction, including approval of the plan for correction and the new policy and procedure.

The recipient filed its required Notices of Federal Interest and established a process to ensure additional notices would be filed if required. This area of noncompliance is corrected.

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