



ADMINISTRATION FOR  
**CHILDREN & FAMILIES**

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RECEIVED  
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**To: Board Chairperson**  
*Ms. Anne Harala*  
*Board Chairperson*  
*Duluth Public School District #709*  
*2102 N. Blackman Avenue*  
*Duluth, MN 55811-4803*

**From: Responsible HHS Official**  
*Dr. Blanca Enriquez*  
*Director, Office of Head Start*

*Blanca E. Enriquez* 8/21/16  
Date

## Overview of Findings

From 5/10/2016 to 5/11/2016, the Administration for Children and Families (ACF) conducted an Environmental Health and Safety (EnvHS) review event for the Duluth Public School District #709 Head Start program. We wish to thank the governing body, Policy Council, staff, and parents of your program for their cooperation and assistance during the review event. This Head Start Review Event Report has been issued to Ms. Anne Harala, Board Chairperson, as legal notice to your agency of the results of the on-site review event.

Based on the information gathered during this review event, a determination has been made that Duluth Public School District #709 is a grantee with at least one area of deficiency in its Head Start program. Within 30 days of receipt of this report, you must submit a Quality Improvement Plan (QIP) to your ACF Regional Office detailing your plan for corrective action.

If you anticipate that you will not be able to correct all deficiencies within the correction time specified in this report, you must submit a letter to your ACF Regional Office requesting an extension, with an explanation as to why an extension is necessary. The letter requesting an extension must be submitted prior to the expiration of the original corrective action time period.

In order to allow for sufficient time to consider extension requests, we ask that you submit your request no later than 30 days before the end of the corrective action time period. Extension requests shall not be considered approved unless you receive such approval in writing before the deadline for correction.

The 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 ACF Regional Office with any questions or concerns you may have about this report.

### Distribution of the Head Start Review Report

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

- Ms. Kay Willmoth, Regional Program Manager
- Mr. Mike Van Ert, Policy Council Chairperson
- Mr. Bill Gronseth, CEO/Executive Director
- Ms. Pamela Rees, Head Start Director

**Overview Information**

Review Type: *EnvHS*  
Organization: *Duluth Public School District #709*  
Program Type: *Head Start*  
Field Lead: *Ms. Corliss Starks*  
Funded Enrollment HS: *255*  
Funded Enrollment EHS: *Not Applicable*

## Glossary

A glossary of terms has been included to explain the various terms used throughout this report.

Term	Definition
<b>Compliance Measure (CM)</b>	The specific statements that collectively assess the level of program performance for each Key Indicator, focusing on one or more Federal regulations critical to the delivery of quality services and the development of strong management systems.
<b>Strength</b>	A new and/or unique way of reaching the community.
<b>Compliant</b>	No findings. Meets requirements of Compliance Measure.
<b>Concern</b>	An area or areas of performance which need improvement or technical assistance. These items should be discussed with the Regional Office and do not include a timeframe for correction.
<b>Noncompliance</b>	A finding that indicates the agency is out of compliance with Federal requirements (including, but not limited to, the Head Start Act or one or more of the performance standards) in an area or areas of program performance, but does not constitute a deficiency. Noncompliances require a written timeline of correction and possible technical assistance (TA) or guidance from their program specialist, and if not corrected within the specified timeline, can become a deficiency.
<b>Deficiency</b>	<p>An area or areas of performance in which an Early Head Start or Head Start grantee agency is not in compliance with State or Federal requirements (including but not limited to, the Head Start Act or one or more of the regulations) and which involves:</p> <p>(A) A threat to the health, safety, or civil rights of children or staff;</p> <p>(B) A denial to parents of the exercise of their full roles and responsibilities related to program governance;</p> <p>(C) A failure to perform substantially the requirements related to Early Childhood Development and Health Services, Family and Community Partnerships, or Program Design and Management; or</p> <p>(D) The misuse of Head Start grant funds.</p> <p>(i) The loss of legal status or financial viability, as defined in part 1302 of this title, loss of permits, debarment from receiving Federal grants or contracts or the improper use of Federal funds; or</p> <p>(iii) Any other violation of Federal or State requirements including, but not limited to, the Head Start Act or one or more of the performance standards of this title, and which the grantee has shown an unwillingness or inability to correct within the period specified by the responsible HHS official, of which the responsible HHS official has given the grantee written notice of pursuant to section 1304.61.</p>

Summary of Findings

Finding Type	Applicable Standards	Program Type	Grant	Timeframe	Compliance Level
Safe and Clean Environments	1304.53(a)(10)(x, xvi)	HS	05CH8398	180 days	Deficiency

Environmental Health & Safety

CM#	Compliance Measure	Compliance Level
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**EnvHS 1.1** **PART 1304 - Program Performance Standards For Operation Of Head Start Programs By Grantees And Delegate Agencies**  
**1304.53 Facilities, Materials, and Equipment.**  
**(a) Head Start Physical Environment and Facilities**  
**(10) Grantee and delegate agencies must conduct a safety inspection, at least annually, to ensure that each facility's space, light, ventilation, heat, and other physical arrangements are consistent with the health, safety and developmental needs of children. At a minimum, agencies must ensure that:**  
**(x) The selection, layout, and maintenance of playground equipment and surfaces minimize the possibility of injury to children;**  
**(xvi) All sewage and liquid waste is disposed of through a locally approved sewer system, and garbage and trash are stored in a safe and sanitary manner; and**

**Deficiency**  
 1304.53(a)(10)(x, xvi)

EnvHS (5/10/2016)

The grantee did not ensure the selection and maintenance of playground equipment and surfaces minimized the possibility of injury to children and did not ensure garbage and trash were stored in a safe and sanitary manner.

It is critical for playgrounds to be designed to meet the developmental needs of the children using them and for all indoor and outdoor areas to be routinely monitored to identify and address any potential safety hazards.

**Age-Inappropriate Playground Equipment**

Observations on the grantee's five playground settings--at the Barnes Early Childhood, Piedmont, MacArthur, Myers Wilkins, and Stowe Centers--found equipment at all five centers was not suitable for Head Start children. A large climbing structure--flexible climber/spider's web--approximately 15 feet high occupied the middle of each playground. Even though other, more appropriate equipment was available for the Head Start children, the corners of the large climber overlapped the areas designated for Head Start. The centers were all located in elementary schools, and the playgrounds were shared with the older, elementary-school children. Center staff stated the Head Start children were not allowed on the structures; however, there were no barriers, signage, or other visible means to prevent the younger children from accessing the structures.

**Insufficient Surfacing**

An observation on the Piedmont Center playground found a lack of shock-absorbing material in the fall zone directly under the tire swing to protect the children from injury.

**Maintenance**

An observation on the Stowe Center playground found it was in need of maintenance and repairs. There were laceration hazards on the tube slide and the metal climbing structure, with an area of chipping paint on the climbing structure. In addition, the section before the opening to the tube slide had a crack in the plastic, with serrated edges measuring approximately 12 inches in length.

**Unsanitary Trash Storage**

Observations in the Stowe Center found an uncovered trashcan in the classroom next

to the housekeeping area, exposing the children to contaminated tissues and materials. An observation in Barnes Early Childhood Center found an uncovered trashcan in the classroom next to the refrigerator area, exposing the children to contaminated paper towels, presenting unsanitary conditions for the children.

The grantee did not ensure the selection and maintenance of playground equipment minimized the possibility of injury to children and did not ensure garbage and trash were stored in a safe and sanitary manner, therefore, it was not in compliance with the regulation.

Timeframe for correction: 180 days

This finding constitutes a deficiency as defined under Sec. 637(2)(A)(i) of the Head Start Act as a systematic or substantial material failure in the area of performance that the Secretary determines involves a threat to the health, safety, or civil rights of children and staff.

<b>EnvHS 1.2</b>	The program ensures facilities are prepared for and equipped to prevent emergencies.	<b>Compliant</b>
		1304.22(a)(1, 3), 1304.53(a)(10)(v-vii), 1306.35(b)(1), 1306.35(b)(2)(ii-iii)
<b>EnvHS 1.3</b>	All facilities comply with State and local licensing requirements including, but not limited to, child care licensing, fire and building inspections, and occupancy permits	<b>Compliant</b>
		1306.30(e), 1306.35(d)
<b>EnvHS 2.1</b>	The program implements sanitation and hygiene practices to ensure the health and safety of all staff, volunteers, and children. This includes: <ul style="list-style-type: none"> <li>• Handwashing</li> <li>• Cleaning of spilled bodily fluids</li> <li>• Diapering</li> </ul>	<b>Compliant</b>
		1304.22(e)(1)(i-iv), 1304.22(e)(3-5)
<b>EnvHS 2.2</b>	The program's Nutrition program is designed and implemented to: <ul style="list-style-type: none"> <li>• Comply with USDA nutrition requirements</li> <li>• Ensure food safety, including all meals are void of choking hazards</li> <li>• Ensure that breast milk and formula are handled appropriately (when applicable)</li> <li>• Meet the individual nutritional needs and feeding requirements of each child (including children with special dietary, medical, or disability needs)</li> </ul>	<b>Compliant</b>
		1304.23(h)(1), 1304.23(h)(1)(vii), 1304.23(e)(2)
<b>EnvHS 2.3</b>	The program ensures the effective management of medication according to physician instructions, including proper labeling, storage, and administration.	<b>Compliant</b>
		1304.22(e)(1-4)
<b>EnvHS 3.1</b>	Prior to employing an individual, the program obtains a: <ul style="list-style-type: none"> <li>• Federal, State, or Tribal criminal record check (CRC) covering all jurisdictions in which it provides Head Start services to children</li> <li>• Federal, State, or Tribal CRC as required by the law of the jurisdiction in which the program provides Head Start services</li> <li>• CRC as otherwise required by Federal law</li> </ul>	<b>Compliant</b>
		648A(g)(3)(A-C)
<b>EnvHS 3.2</b>	The program ensures the maintenance of appropriate class and group sizes based on the predominant age of the children.	<b>Compliant</b>
		1304.52(g)(4), 1306.20(g)(1-2), 1306.32(a)(1-6)
<b>EnvHS 3.3</b>	The program arranges all outdoor play areas to prevent children from getting into unsafe and/or unsupervised areas. The program also ensures that children en route to play areas are not exposed to vehicular traffic without supervision.	<b>Compliant</b>
		1304.53(a)(9), 1306.35(b)(2)(vi)

<b>EnvHS 3.4</b>	The program ensures children are released only to a parent, legal guardian, or other individuals as designated in writing by the parent or legal guardian.	<b>Compliant</b> 1310.10(g)
<b>EnvHS 3.5</b>	Staff actively supervise children at all times.	<b>Compliant</b> 1304.52(f)(1)(iii), 1306.35(b)(2)(iv)
<b>EnvHS 3.6</b>	Staff use positive child guidance when responding to undesired behavior.	<b>Compliant</b> 1304.52(f)(1)(iv)
<b>EnvHS 4.1</b>	The program's vehicles are properly equipped.	<b>Compliant</b> 1310.10(d)(1-4), 1310.12(a), 1310.12(b)(2)
<b>EnvHS 4.2</b>	At least one bus monitor is aboard the vehicle at all times.	<b>Compliant</b> 1310.15(c)
<b>EnvHS 4.3</b>	Each bus monitor, before duty, has been trained on: <ul style="list-style-type: none"> <li>• Child boarding-and-exiting procedures</li> <li>• Use of child restraint systems</li> <li>• Required paperwork</li> <li>• Emergency response and evacuation procedures</li> <li>• Use of special equipment</li> <li>• Child pick-up and release procedures</li> <li>• Pre- and post-trip vehicle checks</li> </ul>	<b>Compliant</b> 1310.17(f)(2)
<b>EnvHS 4.4</b>	The program ensures that persons employed to drive vehicles receive the required behind-the-wheel and classroom training before transporting children.	<b>Compliant</b> 1310.17(b)(1-7)

— END OF REPORT —

### FY 2016 Environmental Health & Safety Monitoring Report Appendix

*This appendix provides details on issues identified during observation of centers and classrooms during the Environmental Health & Safety monitoring event. The information is organized by grantee center and classroom. It includes findings associated with noncompliances and deficiencies identified in the review report as well as issues related to concerns, which do not require corrective action but may warrant attention. The Office of Head Start has provided this resource to assist grantees in continuous program improvement. The review report itself, to which this appendix is attached, remains the official, legal notice communicating findings that require correction. The federal regulations associated with each of the findings are provided in the official report. This appendix is designed to be used in conjunction with the official report.*

Center	Classroom	CM	Item Type	Details
Barnes Early Childhood Center	--	EnvHS1.1	180-day correction period	There was an uncovered trashcan in the classroom next to the refrigerator area, exposing the children to contaminated paper towels.
Barnes Early Childhood Center	--	EnvHS1.1	180-day correction period	There was playground equipment that was not age-appropriate for Head Start children. There was a large climbing structure that was approximately 15 feet high, in the middle of the playground. Even though other, more suitable equipment was available for the Head Start children, the corners of the large climber overlapped the areas designated for Head Start. The center was located in an elementary school and the playground was shared with the older elementary-school children.
MacArthur	--	EnvHS1.1	180-day correction period	There was playground equipment that was not age-appropriate for Head Start children. There was a large climbing structure that was approximately 15 feet high, in the middle of the playground. Even though other, more suitable equipment was available for the Head Start children, the corners of the large climber overlapped the areas designated for Head Start. The center was located in an elementary school and the playground was shared with the older elementary-school children.
Myers Wilkins Head Start	--	EnvHS1.1	180-day correction period	There was playground equipment that was not age-appropriate for Head Start children. There was a large climbing structure that was approximately 15 feet high, in the middle of the playground. Even though other, more suitable equipment was available for the Head Start children, the corners of the large climber overlapped the areas designated for Head Start. The center was located in an elementary school and the playground was shared with the older elementary-school children.
Piedmont	--	EnvHS1.1	180-day correction period	There was a lack of shock-absorbing material in the fall zone under the tire swing to protect children from injury.
Piedmont	--	EnvHS1.1	180-day correction period	There was playground equipment that was not age-appropriate for Head Start children. There was a large climbing structure that was approximately 15 feet high, in the middle of the playground. Even though other, more suitable equipment was available for the Head Start children, the corners of the large climber overlapped the areas designated for Head Start. The center was located in an elementary school and the playground was shared with the older elementary-school children.

Center	Classroom	CM	Item Type	Details
Stowe	--	EnvHS1.1	180-day correction period	The playground was in need of maintenance and repairs. There were laceration hazards on the tube slide and on the metal climbing structure, with an area of chipping paint on the climbing structure and the section before the opening to the tube slide with a crack in the plastic, with serrated edges measuring approximately 12 inches in length.
Stowe	--	EnvHS1.1	180-day correction period	There was playground equipment that was not age-appropriate for Head Start children. There was a large climbing structure that was approximately 15 feet high, in the middle of the playground. Even though other, more suitable equipment was available for the Head Start children, the corners of the large climber overlapped the areas designated for Head Start. The center was located in an elementary school and the playground was shared with the older elementary-school children.
Stowe	--	EnvHS1.1	180-day correction period	There was an uncovered trashcan in the classroom next to the housekeeping area, exposing the children to contaminated tissues and materials.