



**Corrective Action Plan in Response to Federal
Overview of Findings Report**



12/03/2015



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The Administration for Children and Families (ACF) Head Start Overview of Findings, dated 10/02/15 and received by the City of San Antonio on 10/6/15, identified three areas of non-compliance and six areas of concern related to Environmental Health and Safety. This Corrective Action Plan (CAP) addresses corrective actions for the three non-compliances and six areas of concern found during the Federal Review of Healthy and Safe Environments. The CAP details how findings have been corrected and how the Grantee will ensure that systems are in place to ensure the types of findings discovered do not reoccur in the Program.

I. Non-Compliances

A. Non-compliance in Safe and Clean Facilities

The grantee did not ensure each facility's physical arrangements were consistent with the health, safety, and developmental needs of children and free of safety hazards for children, families, and staff. Observation of 218 program settings found 15 did not provide safe and healthy indoor learning environments.

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:

(xi) Electrical outlets accessible to children prevent shock through the use of child-resistant covers, the installation of child-protection outlets, or the use of safety plugs;

(xiv) Toilets and handwashing facilities are adequate, clean, in good repair, and easily reached by children. Toileting and diapering areas must be separated from areas used for cooking, eating, or children's activities;

(7) Grantee and delegate agencies must provide for the maintenance, repair, safety, and security of all Early Head Start and Head Start facilities, materials and equipment.

(8) Grantee and delegate agencies must provide a center-based environment free of toxins, such as cigarette smoke, lead, pesticides, herbicides, and other air pollutants as well as soil and water contaminants. Agencies must ensure that no child is present during the spraying of pesticides or herbicides. Children must not return to the affected area until it is safe to do so.

B. Non-Compliance in Healthy Learning Environments



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The grantee did not ensure facilities were clean and kept free of undesirable and hazardous conditions. Observations in 218 program settings found 35 did not provide clean and safe learning environments.

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:

(viii) Indoor and outdoor premises are cleaned daily and kept free of undesirable and hazardous materials and conditions;

C. Non-Compliance in Safe Learning Environments

The grantee did not ensure its established Ongoing Monitoring Procedures ensured Program goals, objectives, and standards were met. The grantee's monitoring activities did not ensure corrective-action-plan activities were implemented and maintained and did not identify all areas of noncompliance.

The grantee's inadequate monitoring was reflected in the condition of facilities and equipment. Observations of 218 settings found 50 were not maintained and were deemed unsafe. The majority of identified issues were never found during the grantee's monitoring visits. In addition, when issues were identified, there was no evidence of follow-up to determine whether health and safety hazards were corrected.

Applicable Standard: Head Start Act

Sec. 641A. Standards: Monitoring of Head Start Agencies and Programs

(g) Self Assessment-

(3) Ongoing Monitoring- Each Head Start agency and each delegate agency shall establish and implement procedures for the on-going monitoring of their respective Programs, to ensure that the operations of the Programs work toward meeting Program goals and objectives and standards described in section (a)(1).

II. Plan to correct areas of non-compliance

A. Corrective Action for Non-compliance in Safe and Clean Facilities

B. Corrective Action for Non-Compliance in Healthy Learning Environments



C. Corrective Action for Non-compliance in Safe Learning Environments



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