



August 5, 2010

TO: Yvette Sanchez Fuentes
Director, Office of Head Start
Administration for Children and Families

FROM: /George M. Reeb/
Acting Deputy Inspector General for Audit Services

SUBJECT: Review of Head Start Health and Safety Standards at Brooklyn Child and Family Services, Inc. (A-02-09-02013)

Attached, for your information, is an advance copy of our final report on Brooklyn Child and Family Services, Inc.'s (the Grantee) compliance with Head Start health and safety standards. We will issue this report to the Grantee within 5 business days. The Administration for Children and Families, Office of Head Start, requested this review.

If you have any questions or comments about this report, please do not hesitate to call me, or your staff may contact Lori S. Pilcher, Assistant Inspector General for Grants, Internal Activities, and Information Technology Audits, at (202) 619-1175 or through email at Lori.Pilcher@oig.hhs.gov or James P. Edert, Regional Inspector General for Audit Services, Region II, at (212) 264-4620 or through email at James.Edert@oig.hhs.gov. Please refer to report number A-02-09-02013.

Attachment



Office of Audit Services
Jacob Javits Federal Building
26 Federal Plaza, Room 3900
New York, NY 10278

August 9, 2010

Report Number: A-02-09-02013

Ms. Kim Rozzi
Executive Director
Brooklyn Child and Family Services, Inc.
44-60 Rockwell Place
Brooklyn, NY 11201

Dear Ms. Rozzi:

Enclosed is the U.S. Department of Health & Human Services (HHS), Office of Inspector General (OIG), final report entitled *Review of Head Start Health and Safety Standards at Brooklyn Child and Family Services, Inc.* We will forward a copy of this report to the HHS action official noted on the following page for review and any action deemed necessary.

The HHS action official will make final determination as to actions taken on all matters reported. We request that you respond to this official within 30 days from the date of this letter. Your response should present any comments or additional information that you believe may have a bearing on the final determination.

Section 8L of the Inspector General Act, 5 U.S.C. App., requires that OIG post its publicly available reports on the OIG Web site. Accordingly, this report will be posted at <http://oig.hhs.gov>.

If you have any questions or comments about this report, please do not hesitate to call me, or contact John Madigan, Audit Manager, at (518) 437-9390, extension 224, or through email at John.Madigan@oig.hhs.gov. Please refer to report number A-02-09-02013 in all correspondence.

Sincerely,

/James P. Edert/
Regional Inspector General
for Audit Services

Enclosure

Direct Reply to HHS Action Official:

Ms. Carolyn Baker-Goode
Acting Regional Program Manager
Administration for Children and Families
26 Federal Plaza, Room 4114
New York, NY 10278

Department of Health & Human Services

**OFFICE OF
INSPECTOR GENERAL**

**REVIEW OF HEAD START
HEALTH AND SAFETY STANDARDS AT
BROOKLYN CHILD AND
FAMILY SERVICES, INC.**



Daniel R. Levinson
Inspector General

August 2010
A-02-09-02013

Office of Inspector General

<http://oig.hhs.gov>

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The Office of Audit Services (OAS) provides auditing services for HHS, either by conducting audits with its own audit resources or by overseeing audit work done by others. Audits examine the performance of HHS programs and/or its grantees and contractors in carrying out their respective responsibilities and are intended to provide independent assessments of HHS programs and operations. These assessments help reduce waste, abuse, and mismanagement and promote economy and efficiency throughout HHS.

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Notices

THIS REPORT IS AVAILABLE TO THE PUBLIC
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Section 8L of the Inspector General Act, 5 U.S.C. App., requires that OIG post its publicly available reports on the OIG Web site.

OFFICE OF AUDIT SERVICES FINDINGS AND OPINIONS

The designation of financial or management practices as questionable, a recommendation for the disallowance of costs incurred or claimed, and any other conclusions and recommendations in this report represent the findings and opinions of OAS. Authorized officials of the HHS operating divisions will make final determination on these matters.

EXECUTIVE SUMMARY

BACKGROUND

Within the U.S. Department of Health & Human Services, the Administration for Children and Families, Office of Head Start (OHS), administers the Head Start and Early Head Start programs. We refer collectively to both programs as the Head Start program. In fiscal year (FY) 2009, Congress appropriated \$7.1 billion to fund the program's regular operations. The American Recovery and Reinvestment Act of 2009, P.L. No. 111-5 (Recovery Act), provides an additional \$2.1 billion for the Head Start program during FYs 2009 and 2010.

Brooklyn Child and Family Services, Inc. (the Grantee), provides early learning services to children up to 5 years of age and families in Brooklyn, New York, through a variety of programs. For the grant year ended January 31, 2009, OHS awarded approximately \$2.56 million in Federal Head Start funds to the Grantee to provide services to 203 children and pregnant women. On August 21, 2009, the Grantee also received \$142,294 in Recovery Act funding.

OBJECTIVE

Our objective was to determine whether the Grantee complied with applicable Federal and State requirements on ensuring the health and safety of children in its care.

SUMMARY OF FINDINGS

The Grantee did not fully comply with Federal and State requirements on ensuring the health and safety of children in its care. Specifically, as of July 2009:

- The Grantee's files showed that the Grantee did not obtain timely criminal background checks on 21 of its 36 Head Start employees. The files on the 15 remaining employees had all required documents.
- The Grantee's childcare facility did not meet all Federal Head Start and State regulations on protecting children from unsafe materials and equipment.

These deficiencies occurred because the Grantee did not have adequate procedures or did not consistently follow procedures that were in place to ensure that it complied with Federal and State health and safety requirements. The Grantee's failure to follow these requirements jeopardized the health and safety of children in its care.

RECOMMENDATIONS

We recommend that the Grantee develop and consistently follow procedures to ensure that:

- all employee files contain documentation of timely criminal background checks and
- all unsanitary and unsafe conditions are corrected.

GRANTEE COMMENTS

In written comments on our draft report, the Grantee concurred with our findings and described its completed and ongoing actions to address the deficiencies that we identified. The Grantee's comments are included in their entirety as Appendix B.

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INTRODUCTION

BACKGROUND

Federal Head Start Program

Title VI of the Omnibus Budget Reconciliation Act of 1981 established Head Start as a Federal discretionary grant program. The major program objectives include promoting school readiness and enhancing the social and cognitive development of low-income children by providing health, educational, nutritional, and social services. In 1994, the Head Start program was expanded to establish Early Head Start, which serves children from birth to 3 years of age. We refer collectively to both programs as the Head Start program.

Within the U.S. Department of Health & Human Services, the Administration for Children and Families (ACF), Office of Head Start (OHS), administers the Head Start program. In fiscal year (FY) 2009, Congress appropriated \$7.1 billion to fund Head Start's regular operations.

The American Recovery and Reinvestment Act of 2009, P.L. No. 111-5 (Recovery Act), provides an additional \$2.1 billion for the Head Start program during FYs 2009 and 2010. These funds are intended for activities such as expanding enrollment, funding cost-of-living wage increases for grantees, upgrading centers and classrooms, and bolstering training and technical assistance.

Federal Regulations for Head Start Grantees

Pursuant to Federal Head Start regulations (45 CFR § 1304.53(a)(7)), Head Start grantees must provide for the maintenance, repair, safety, and security of all Head Start facilities. These regulations also specify that facilities used by Head Start grantees for regularly scheduled, center-based activities must comply with State and local licensing regulations. Alternatively, if State and local licensing standards are less stringent than the Head Start regulations or if no State licensing standards are applicable, grantees must ensure that their facilities comply with the Head Start Program Performance Standards related to health and safety (45 CFR § 1306.30(c)).

Brooklyn Child and Family Services, Inc.

Brooklyn Child and Family Services, Inc. (the Grantee), a licensed nonprofit organization, provides early childhood education, housing, adult literacy, and family support services to children up to 5 years of age and families in Brooklyn, New York. For the grant year ended January 31, 2009, OHS awarded approximately \$2.56 million in Federal Head Start funds to the Grantee to provide services to 203 children and pregnant women. On August 21, 2009, the Grantee also received \$142,294 in Recovery Act funding.

Office of Inspector General Audits

This audit is one of a series of audits that address the health and safety of children who attend Head Start programs. We are conducting these audits in response to the \$2.1 billion in Recovery Act funds appropriated for the Head Start program in FYs 2009 and 2010.

OBJECTIVE, SCOPE, AND METHODOLOGY

Objective

Our objective was to determine whether the Grantee complied with applicable Federal and State requirements on ensuring the health and safety of children in its care.

Scope

Our review covered the Grantee's employee records and facility as of July 2009. To gain an understanding of the Grantee's operations, we conducted a limited review of the Grantee's internal controls as they related to our audit objective.

We performed our fieldwork in July 2009 at the Grantee's administrative office and childcare facility in Brooklyn, New York.

Methodology

To accomplish our objective, we:

- selected the Grantee based on prior risk analyses and discussions with ACF officials;
- reviewed Federal and State laws, regulations, and policies related to Federal grant awards and the Head Start program;
- reviewed the Grantee's Head Start application and current grant award documents;
- reviewed the Grantee's files on all 36 current Head Start employees;¹
- reviewed the Grantee's licenses and documentation of fire inspections;
- visited the 5 classrooms at the Grantee's childcare facility; and
- discussed our preliminary findings with Grantee and ACF officials.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain

¹ The 36 current employees were partially or fully funded by the Head Start grant award.

sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

FINDINGS AND RECOMMENDATIONS

The Grantee did not fully comply with Federal and State requirements on ensuring the health and safety of children in its care. Specifically, as of July 2009:

- The Grantee's files showed that the Grantee did not obtain timely criminal background checks on 21 of its 36 Head Start employees. The files on the 15 remaining employees had all required documents.
- The Grantee's childcare facility did not meet all Federal Head Start and State regulations on protecting children from unsafe materials and equipment.

These deficiencies occurred because the Grantee did not have adequate procedures or did not consistently follow procedures that were in place to ensure that it complied with Federal and State health and safety requirements. The Grantee's failure to follow these requirements jeopardized the health and safety of children in its care.

CRIMINAL BACKGROUND CHECKS

Federal and State Requirements

Pursuant to section 648A(g) of the Head Start Act (42 U.S.C. § 9843a(g)), a Head Start grantee may not hire an individual on a permanent or nonpermanent basis until it obtains (1) a State, tribal, or Federal criminal record check covering all jurisdictions where the grantee provides Head Start services to children; (2) a State, tribal, or Federal criminal record check as required by the law of the jurisdiction where the grantee provides Head Start services; or (3) a criminal record check as otherwise required by Federal law.

In New York State, child daycare centers must perform criminal history record checks on employees and volunteers pursuant to section 390-b.1.(a) of the New York Social Services Law.²

Grantee's Compliance With Federal and State Requirements

Our review of the Grantee's files on all 36 current employees found that the Grantee did not obtain timely criminal record checks on 21 employees.³

² Child daycare centers in New York were required to perform criminal history records checks on employees and volunteers hired prior to December 5, 2000, upon applying for license renewal.

³ The 21 employees comprised the executive director, the deputy director, the program director, the enrollment coordinator, the health and safety coordinator, the inclusion specialist, 2 financial specialists, 3 teachers, 2 teacher assistants, 2 assistant caregivers, 3 maintenance workers, 1 mental health specialist, 1 head cook, and 1 assistant cook.

By not ensuring that all employees who supervised or had routine unsupervised contact with children met all preemployment requirements, the Grantee potentially jeopardized the safety of children in its care.

MATERIAL AND EQUIPMENT SAFETY

Federal and State Regulations

Pursuant to Federal Head Start regulations (45 CFR § 1304.53(a)(7)), grantees must provide for the maintenance, repair, safety, and security of all Head Start facilities, materials, and equipment. Pursuant to 45 CFR § 1304.53(a)(10)(viii), indoor and outdoor premises must be cleaned daily and kept free from undesirable and hazardous materials and conditions.

Pursuant to 45 CFR § 1306.30(c), grantees must ensure that Head Start facilities comply with State and local licensing requirements. If these licensing standards are less comprehensive or less stringent than the Head Start regulations or if no State or local licensing standards are applicable, grantees must ensure that their facilities comply with the Head Start Program Performance Standards related to health and safety.

State regulations (Title 18 § 418-1 of the New York Compilation of Codes, Rules, & Regulations (NYCRR)) specify requirements for buildings and equipment and for health and safety at child daycare facilities, including the following:

- All matches, lighters, medicines, drugs, cleaning materials, detergents, aerosol cans, and other poisonous or toxic materials must be kept in a place inaccessible to children.
- Protective caps, covers, or permanently installed obstructive devices must be used on all electrical outlets that are accessible to children.
- Convenient, adequate, and sanitary toilet facilities must be provided in a separate, properly ventilated room readily accessible to children.
- Garbage receptacles must be covered and cleaned as needed after emptying.
- Suitable precautions must be taken to eliminate all conditions that pose a safety or health hazard in areas accessible to children.

Grantee's Compliance With Material and Equipment Safety Regulations

The Grantee's childcare facility did not meet all Federal Head Start and State health and safety regulations on protecting children from unsafe conditions. Our visit to the Grantee's facility found deficiencies in three of the five classrooms, which we reported to the Grantee after completion of our fieldwork. Specifically:

- In two classrooms, electrical outlets lacked protective caps (Appendix A, Photograph 1).

- A children’s bathroom had no toilet paper (Appendix A, Photograph 2).
- In two classrooms, garbage receptacles were not covered (Appendix A, Photograph 3).
- In two classrooms, carpets were not secured to the floor and presented a tripping hazard (Appendix A, Photograph 4).
- In one classroom, a bingo marker with a warning label that stated “KEEP AWAY FROM CHILDREN” was left in an area accessible to children (Appendix A, Photograph 5).

By not ensuring that all facilities were kept free from unsafe conditions, the Grantee jeopardized the safety of children in its care.

INADEQUATE OR INCONSISTENTLY FOLLOWED PROCEDURES

These deficiencies occurred because the Grantee did not have adequate procedures or did not consistently follow procedures that were in place to ensure that it complied with Federal and State health and safety requirements.

RECOMMENDATIONS

We recommend that the Grantee develop and consistently follow procedures to ensure that:

- all employee files contain documentation of timely criminal background checks and
- all unsanitary and unsafe conditions are corrected.

GRANTEE COMMENTS

In written comments on our draft report, the Grantee concurred with our findings and described its completed and ongoing actions to address the deficiencies that we identified. The Grantee’s comments are included in their entirety as Appendix B.

APPENDIXES

**APPENDIX A: LACK OF COMPLIANCE WITH
HEALTH AND SAFETY REGULATIONS**



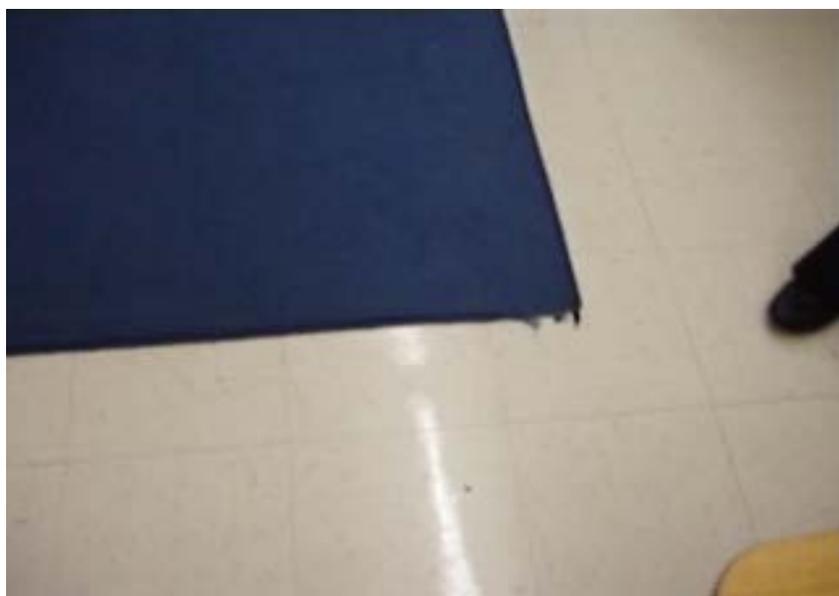
Photograph 1 – Taken in a classroom on 7/13/2009 showing an uncovered electrical outlet.



Photograph 2 – Taken in a bathroom on 7/13/2009 showing an empty toilet paper dispenser. No additional rolls of toilet paper were readily available.



Photograph 3 – Taken in a classroom on 7/13/2009 showing an uncovered garbage receptacle.



Photograph 4 – Taken in a classroom on 7/13/2009 showing carpet not secured to the floor.



Photograph 5 – Taken in a classroom on 7/13/2009 showing a bingo marker accessible to children that was labeled “KEEP AWAY FROM CHILDREN.”

APPENDIX B: GRANTEE COMMENTS



Brooklyn Child And Family Services

44-60 Rockwell Place
Brooklyn, NY 11201



July 13, 2010

James P. Edert
Regional Inspector General for Audit Services
Office of Inspector general
Office of Audit Services
Jacob Javits Federal Building
26 Federal Plaza – Room 3900
New York, NY 10278

Report Number – A02-09-02013

Dear Mr. Edert,

Brooklyn Child and Family Services (BCAFS), in accordance with the required response to the Department of Health & Human Services Office of the Inspector General's findings in relation to the above captioned report number, submits the detailed response for you to review.

I assumed the role of Executive Director at Brooklyn Child and Family Services in March 2010. Therefore I have interviewed staff members who were present at the time of the review and compiled the attached information to address the findings in this report.

CRIMINAL BACKGROUND CHECKS

Federal and State Regulations

Pursuant to section 648A(g) of the Head Start Act (U.S.C. § 9843(g)), a Head Start grantee may not hire an individual on a permanent or non permanent basis until it obtains (1) a State, tribal, or Federal criminal check covering all jurisdictions where grantee provides Head Start services to children; (2) a State, tribal, or Federal criminal record check as required by the law of the jurisdiction where the grantee provides Head Start services; or (3) a criminal record check as otherwise required by federal law.

In New York State, child day care centers must perform criminal history record checks on employees and volunteers pursuant to section 390-b1. (a) of the New York Social Services Law.

Finding

A review of the Grantee's files on all 36 current employees found that the Grantee did not obtain timely criminal record checks on 21 employees.

Response:

Per your finding you indicated that, Brooklyn Child and Family Services did not obtain timely criminal background checks on 21 of its 36 Head Start employees.

In an interview with the HR specialist, and other staff who were present at the time, I confirmed that The Grantee's childcare facility did not meet all Federal Head Start and State health and safety regulations on protecting children from unsafe conditions. Because of several long term vacancies employees were hired prior to a criminal background check been completed. We note that management has instituted measures to ensure that all potential employees received the appropriate SCR screening prior to their hiring, however, Offer letters to the employees were made prior to the clearance. The grantee did have adequate procedures in place to perform criminal record checks but did not follow these procedures during the period prior to in these deficiencies. The reason identified was the need to fill numerous long term vacancies at the Agency.

BCAFS Action to Remedy The Situation

To date Brooklyn Child and Family Services has a consistent and established procedure to ensure that all employee files contain documentation of timely criminal background checks.

BCAFS Action to Remedy Area of Deficiency	Staff Responsible	Timelines	Supporting Documentation
As of August 2009 no employee is hired without proper documentation	HR Specialist	Policy and procedures were created in August 2009	a roster which is checked on a monthly basis to ensure compliance with all necessary information as required by regulatory requirements.

MATERIAL AND EQUIPMENT SAFETY

Federal and State Regulations

Pursuant to Federal Head Start regulations (45 CFR & 1304.53 (a) (7), grantee must provide for maintenance, repair, safety, and security of all Head Start facilities, materials, and equipment. Pursuant to 45 CFR & 1304.53(a) (10) (viii), indoor and outdoor premises must be cleaned daily and kept free from undesirable and hazardous material and conditions.

Pursuant to 45 CFR & 1306.30©, grantees must ensure that Head Start facilities comply with State and local licensing requirements. If these licensing standards are less comprehensive or less stringent than Head Start regulations or if no State or local licensing standards are applicable, grantees must ensure that their facilities comply with Head Start Program performance Standards related to health and safety.

State regulations (Title 18 § 418-1 of the New York Compilation of Codes, Rules, & Regulations (NYCRR) specify requirements for buildings and equipment and for health and safety at child daycare facilities, including the following:

- All matches, lighter, medicines, drugs, cleaning materials, detergents, aerosol cans, and other poisonous or toxic materials must be kept in a place inaccessible to children.
- Protective caps, covers, or permanently installed obstructive devices,, must be used on all electrical outlets that are accessible to children.
- Convenient, adequate, and sanitary toilet facilities must be provided in a separate, properly ventilated room readily accessible to children.
- Garbage receptacles must be covered and cleaned as needed after emptying.
- Suitable precautions must be taken to eliminate all conditions that pose a safety or health hazard in areas accessible to children.

Grantee's Compliance with Material and Equipment Safety Regulations

The Grantee's childcare facility did not meet all Federal Head Start and State health and safety regulations on protecting children from unsafe conditions. Our visit to the Grantee's facility found deficiencies in three of five classrooms, which we reported to the Grantee after completion of our fieldwork.

Response:

In interviews with the Health and Safety coordinator and Maintenance staff confirmed the accuracy of the findings. It has been reported that immediately after the field inspection the following has taken place. Specifically:

- **In two classrooms, electrical outlets lacked protective caps (Appendix, Photograph 1).**

BCAFS Action to Remedy Area of Deficiency	Staff Responsible	Timelines	Supporting Documentation
<p>Safety Caps were placed in the two electrical outlets in the classrooms.</p> <p>A policy and procedure for replacing safety caps in electrical outlets after they are used by the staff were designed and given to the teachers as well as placed in all classrooms.</p> <p>Health and Safety Coordinator will monitor Head Start and Early Head Start Classrooms on a weekly basis to ensure that all electrical outlets have safety caps inserted into them tightly.</p> <p>ECE Director will also monitor the classrooms on a monthly basis to ensure that when the teachers used the electrical outlets, they replaced the safety caps tightly into the electrical outlets.</p>	<p>Health and Safety Coordinator will monitor classrooms weekly</p> <p>ECE Director will monitor classrooms monthly</p>	<p>Immediately</p> <p>A new procedure was implemented after the July 2009 Visit</p>	<p>BCAFS Classrooms Electrical Outlets Check list</p>

A children's bathroom had no toilet paper (Appendix, Photograph 1).

BCAFS Action to Remedy Area of Deficiency	Staff Responsible	Timelines	Supporting Documentation
<p>The maintenance staff has replaced toilet tissue in the bathroom immediately after they were instructed.</p> <p>The maintenance staff will monitor all classrooms bathrooms three times daily to ensure all bathrooms are fully stocked with needed supplies.</p> <p>Maintenance Supervisor will monitor all bathrooms on a daily basis to ensure all supplies are in place.</p>	<p>Maintenance Staff will monitor Classrooms' bathrooms daily</p> <p>Maintenance Supervisor</p>	<p>Daily and on going</p>	<p>BCAFS Bathroom Supplies Daily Check List</p>

In two classrooms, garbage receptacles were not covered (Appendix, Photograph 3)

BCAFS Action to Remedy Area of Deficiency	Staff Responsible	Timelines	Supporting Documentation
<p>The garbage receptacles lids were placed back on the garbage container.</p> <p>A policy and procedure was implemented for garbage receptacles lid to remain on garbage receptacles at all times in the classrooms.</p> <p>Teachers must replace lids on garbage receptacles after they emptied food into the garbage container on a daily basis.</p>	<p>Health and Safety Coordinator will monitor daily</p> <p>ECE Director will monitor weekly</p> <p>Teachers daily and on going</p>	<p>Daily and on-going</p> <p>A new procedure was implemented after the July 2009 Visit</p>	<p>BCAFS Garbage Receptacles lids check list</p>

In two classrooms, carpets were not secured to the floor and presented a tripping hazard (Appendix, Photograph 4).

BCAFS Action to Remedy Area of Deficiency	Staff Responsible	Timelines	Supporting Documentation
<p>The carpets were taped down on the floor by the maintenance staff.</p> <p>The maintenance Supervisor conducts weekly check in the classrooms to ensure the taped carpets are secured and not in a trip hazard condition.</p> <p>The Health and Safety Coordinator also inspect the classrooms on a monthly basis to ensure all rugs are well secure on the floor.</p>	<p>Maintenance Staff will check daily</p> <p>Maintenance Supervisor conducts weekly classroom inspections</p> <p>Health and Safety Coordinator will monitor the carpets monthly and on going</p>	<p>Daily and On-going</p>	<p>BCAFS Classroom Carpet safety Checklist</p>

