



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](http://eclkc.ohs.acf.hhs.gov)

## Program Performance Summary Report

**To: Authorizing Official/Board Chairperson**

Mr. AB Conley

Big Sandy Area Community Action Program

230 Court St Rm 332

Paintsville, KY 41240 - 1606

**From: Responsible HHS Official**

**Date: 04/01/2024**

**Mr. Khari M. Garvin**

**Director, Office of Head Start**

From January 29, 2024 to February 2, 2024, the Administration for Children and Families (ACF) conducted a Focus Area Two (FA2) monitoring review of Big Sandy Area Community Action Program. This report contains information about the grant recipient's performance and compliance with the requirements of the Head Start Program Performance Standards (HSPPS) or Public Law 110-134, *Improving Head Start for School Readiness Act of 2007*.

The Office of Head Start (OHS) would like to thank your governing body, policy council, parents, and staff for their engagement in the review process. Based on the information gathered during this review, it has been determined that your program has at least one area of noncompliance.

This 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 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.

### **DISTRIBUTION OF THE REPORT**

Copies of this report will be distributed to the following:

Ms. Erika Lundy, Regional Program Manager

Ms. Wanda Thacker, Chief Executive Officer/Executive Director

Mr. Tracy Jenkins, Head Start Director

### Grant(s) included as part of this review

Grant Recipient Name	Grant Number(s)
Big Sandy Area Community Action Program	04CH011865

### Glossary of Terms

Term	Definition
<b>Additional Feedback for Program Improvement</b>	An area in which the agency needs to improve performance, also known as an Area of Concern (AOC). These issues should be discussed with the grant recipient's Regional Office for possible technical assistance. This feedback is not considered a non-compliance with federal requirements.
<b>Area of Noncompliance (ANC)</b>	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.
<b>Deficiency</b>	<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"> <li>(i) a threat to the health, safety, or civil rights of children or staff;</li> <li>(ii) a denial to parents of the exercise of their full roles and responsibilities related to program operations;</li> <li>(iii) a failure to comply with standards related to early childhood development and health services, family and community partnerships, or program design and management;</li> <li>(iv) the misuse of funds received under this subchapter;</li> <li>(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</li> <li>(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;</li> </ul> <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>
<b>Strong Practice</b>	An activity or strategy that shows promise for long term sustainable impact. A Strong Practice has an objective basis for claiming effectiveness, potential for replication, and is shareable among other organizations.

## How To Read This Report

The Focus Area Two report includes the following sections:

- **Program Overview**, provides a summary describing the grant recipient.
- **Performance Summary**, provides a table view of compliance by Performance Area.
- **Review Details**, provides details on the grant recipient performance in each Content Area, Performance Area, and Performance Measure.

### Program Overview

Big Sandy Area Community Action Program has served rural Kentucky since 1965. The grant recipient is funded to provide Head Start services to 1113 children. The catchment area is populated with impoverished families, with one sending county having the highest poverty rate in the United States.

### Performance Summary

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

#### Compliance Information

Content Area	Performance Area	Grant Number(s)	Compliance Level	Applicable Standards	Timeframe for Correction
Fiscal Infrastructure	Comprehensive Financial Management Structure and System	04CH011865	Area of Noncompliance	75.302(a)	120 days

## Review Details

This section of the report provides details on grant recipient performance in each Content Area, Performance Area, and Performance Measure.

- Each Performance Area includes the compliant Performance Measures monitored in this review.
- If there are any findings or Strong Practices observed, they will be listed within that Performance Area.



### Program Design, Management, and Improvement

Below is a list of all Performance Areas and compliant Performance Measures monitored in this Content Area, with details on findings and Strong Practices observed, as applicable.

#### Performance Area: Program Design and Strategic Planning

##### *Compliance Details*

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient adjusts its program design to remain responsive to shifts in community needs, strengths, and resources over time.
- The grant recipient uses program data to routinely monitor performance, progress towards goals and desired outcomes, and drive program improvement.
- The grant recipient maintains a system and procedures for collecting, managing, and reporting on accurate, timely data.

#### Performance Area: Program Governance

##### *Compliance Details*

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient collaborates effectively across program staff, the governing body, and the policy council to facilitate effective program governance.
- The grant recipient's governing body is engaged and effective in providing its legal and fiscal oversight.
- The grant recipient's policy councils and policy committees are effective in providing program direction.

##### *Strong Practice Details:*

During the review event the OHS monitoring team observed the following Strong Practice(s) in the Performance Area:

- The grant recipient has formalized systems that remove barriers for policy council member participation.

#### Performance Area: Staffing and Staff Supports

##### *Compliance Details*

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient supports staff members' continuous improvement and professional development.
- The grant recipient develops systems that support the Head Start workforce by providing fair compensation, opportunities for career advancement, and a positive work environment for staff.
- The grant recipient establishes high expectations for staff and implements ongoing communication and training systems to reinforce organizational accountability.
- The grant recipient's leadership and management team have clearly defined, manageable roles and responsibilities and the appropriate experience to effectively execute Head Start program operations.



## Education and Child Development Services

Below is a list of all Performance Areas and compliant Performance Measures monitored in this Content Area, with details on findings and Strong Practices observed, as applicable.

### Performance Area: Curricula, Screening, and Assessment Tools

#### *Compliance Details*

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient implements appropriate ongoing child assessment tools to support children's progress and to individualize for every child.
- The grant recipient implements appropriate screening tools to refer children as indicated for evaluation.
- The grant recipient implements research-based and culturally appropriate curricula to achieve child outcomes.

### Performance Area: Teaching Strategies and Learning Environments

#### *Compliance Details*

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient provides well-organized learning environments and schedules that promote healthy development for enrolled children.
- The grant recipient uses intentionally designed lesson plans to deliver developmentally appropriate experiences for children.
- The grant recipient staff provide responsive, effective care and effective teaching practices that are tailored to meet the needs of all children.

#### *Strong Practice Details:*

During the review event the OHS monitoring team observed the following Strong Practice(s) in the Performance Area:

- The schedule promotes independent learning or the development of self-help skills through a variety of developmentally appropriate routines.

### Performance Area: Qualifications, Professional Development, and Coaching

#### *Compliance Details*

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient offers education staff a system of professional development to support delivery of quality education and child development services.
- The grant recipient implements a research-based coaching strategy to support education staff to use effective teaching practices.
- The grant recipient has qualified education staff.



## Health Services

Below is a list of all Performance Areas and compliant Performance Measures monitored in this Content Area, with details on findings and Strong Practices observed, as applicable.

### Performance Area: Child Health and Oral Health Status and Care

#### *Compliance Details*

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient performs or obtains vision and hearing screenings for all children.
- The grant recipient provides health education opportunities to parents, assists them with understanding their child's health needs, and supports parents to navigate health systems.
- The grant recipient supports children to become and remain up-to-date on a schedule of age-appropriate medical and oral health care, including needs for referrals and follow-up care.
- The grant recipient leverages the Health Services Advisory Committee (HSAC) to address prevalent community health needs.

#### *Strong Practice Details:*

During the review event the OHS monitoring team observed the following Strong Practice(s) in the Performance Area:

- The grant recipient removes barriers for families in accessing health services by proactively designing program health services to mitigate specific community health barriers.

### Performance Area: Mental Health and Social and Emotional Well-Being

#### *Compliance Details*

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient develops a positive program environment, in partnership with a qualified mental health consultant, that promotes the mental health and social emotional well-being of children.
- The grant recipient provides family support services for mental health and social emotional well-being.
- The grant recipient implements positive discipline practices and policies that prohibit the use of expulsion and suspension.

#### *Strong Practice Details:*

During the review event the OHS monitoring team observed the following Strong Practice(s) in the Performance Area:

- The grant recipient regularly offers families information or activities (either through the program or community partners) designed to support families' mental health and wellness.

### Performance Area: Child Nutrition

#### *Compliance Details*

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient implements nutrition services that accommodate children's unique nutritional needs.

### Performance Area: Safe and Sanitary Environments

#### *Compliance Details*

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient's facilities are safe.
- The grant recipient establishes safe environments through daily and ongoing oversight of facility, equipment, and material safety.
- The grant recipient staff engage in appropriate safety practices.
- Staff are observed engaging in appropriate hygiene practices.
- The grant recipient completes background checks prior to hire for all staff.
- The grant recipient establishes appropriate administrative safety practices and policies.
- The grant recipient's equipment, materials, and program environments are safe.
- The grant recipient establishes and follows emergency preparedness plans.

#### *Strong Practice Details:*

During the review event the OHS monitoring team observed the following Strong Practice(s) in the Performance Area:

- The grant recipient has building security plans or measures in place at all facilities to protect children from intruders and to protect the facility in case of an emergency.

**Performance Area: Expectant Families**

Not applicable



## Family and Community Engagement Services

Below is a list of all Performance Areas and compliant Performance Measures monitored in this Content Area, with details on findings and Strong Practices observed, as applicable.

### Performance Area: Program Foundations to Support Family Well-Being and Family Engagement

#### *Compliance Details*

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- Staff are qualified, supported, and develop family assignments based on the specific needs of enrolled families.
- The grant recipient continuously engages all families into the program through open and effective communication.

### Performance Area: Family Partnerships

#### *Compliance Details*

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient implements a family partnership process that includes supports for family-driven goals and progress toward outcomes.

#### *Strong Practice Details:*

During the review event the OHS monitoring team observed the following Strong Practice(s) in the Performance Area:

- The grant recipient provides economic mobility support to help families with pathways out of poverty.

### Performance Area: Promoting Strong Parenting, Parent-Child Relationships, and Engagement in Children's Learning

#### *Compliance Details*

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient implements strategies that promote parental skills and engage parents in children's development.
- The grant recipient chooses and implements a research-based parenting curriculum.

### Performance Area: Community Partnerships

#### *Compliance Details*

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient has identified community partnerships that meet the needs and interests of families.



## Fiscal Infrastructure

Below is a list of all Performance Areas and compliant Performance Measures monitored in this Content Area, with details on findings and Strong Practices observed, as applicable.

### Performance Area: Budget Development, Implementation, and Oversight

#### *Compliance Details*

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient engages in a transparent, data-informed strategic process to develop and maintain a budget that aligns with program goals and circumstances.

### Performance Area: Comprehensive Financial Management Structure and System

#### *Finding Details*

#### **Area of Noncompliance - 75.302(a)**

#### *Summary*

**Grant Number(s) Cited:** 04CH011865

**Timeframe for Correction:** 120 days

#### *Performance Standard Details*

**Regulation Text:** 75.302 Financial management and standards for financial management systems.(a) Each state must expend and account for the Federal award in accordance with state laws and procedures for expending and accounting for the state's own funds. In addition, the state's and the other non- Federal entity's financial management systems, including records documenting compliance with Federal statutes, regulations, and the terms and conditions of the Federal award, must be sufficient to permit the preparation of reports required by general and program-specific terms and conditions; and the tracing of funds to a level of expenditures adequate to establish that such funds have been used according to the Federal statutes, regulations, and the terms and conditions of the Federal award. See also §75.450.

#### *Compliance Details*

- The grant recipient did not submit reports documenting compliance with Federal statutes, regulations, and the terms and conditions of the Federal award in a timely manner.

Additional details from this review event:

- The grant recipient did not submit the Real Property Status Report Standard Form (SF)-429-A for the fiscal years ending October 2021 and October 2022.
- The finance team members stated that the grant recipient had no real property.

### Performance Area: Facilities and Equipment Management Systems

#### *Compliance Details*

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient implements a system for ensuring compliance with requirements for the acquisition, record-keeping, insurance, and disposal of facilities purchased, constructed, or renovated (major renovations) with Head Start funds.
- The grant recipient implements a system for ensuring that equipment purchased with Head Start funds is acquired, used, and disposed of in accordance with requirements.
- The grant recipient assesses and mitigates risk and maintains property loss, casualty, and liability insurance consistent with the replacement value of property and determined risk of liability.



## Eligibility, Recruitment, Selection, Enrollment, and Attendance

Below is a list of all Performance Areas and compliant Performance Measures monitored in this Content Area, with details on findings and Strong Practices observed, as applicable.

### Performance Area: Eligibility

#### *Compliance Details*

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient implements a clear, consistent, and compliant process for enrolling eligible families.
- The grant recipient trains staff to follow ERSEA regulations and establishes written policies and procedures to ensure compliance with eligibility requirements.

### Performance Area: Recruitment

#### *Compliance Details*

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient implements a recruitment strategy focusing on all families with eligible children, with specific outreach efforts to families with vulnerable children.

### Performance Area: Selection

#### *Compliance Details*

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient establishes selection criteria and a waitlist based on community needs.

### Performance Area: Enrollment

#### *Compliance Details*

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient fills at least 10 percent of the program's total funded enrollment with children eligible for services under the Individuals with Disabilities Education Act (IDEA).
- The grant recipient establishes practices to maintain full enrollment and accurately tracks current enrollment.

### Performance Area: Attendance

#### *Compliance Details*

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient consistently employs strategies to encourage regular attendance.

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